

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (MG)
	)	
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	

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**EIGHTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH MAY 31, 2023**

In accordance with the Local Rules for the Southern District of New York, Burns Bair LLP (“Burns Bair” or the “Firm”), special insurance counsel for the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), submits this summary (this “Summary”) of fees and expenses sought as actual, reasonable, and necessary in the fee application to which this Summary is attached (the “Fee Application”)<sup>2</sup> for the period from February 1, 2023 through May 31, 2023<sup>3</sup> (the “Interim Compensation Period”).

Burns Bair submits the Fee Application as an interim fee application in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”).

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Summary shall have the meanings ascribed to such terms in the Application.

<sup>3</sup> The applicant reserves the right to include any time expended and expenses incurred in the period indicated above in future application(s) if it is not included herein.

Name of Applicant:	Burns Bair LLP
Name of client:	Official Committee of Unsecured Creditors
Time period covered by this application:	February 1, 2023 through May 31, 2023
Total compensation sought this period:	\$346,389.75
Total expenses sought this period:	\$7,618.93
Petition Date:	October 1, 2020
Retention Date:	Effective October 29, 2020
Date of order approving employment:	December 9, 2020
Total compensation approved by interim orders to date:	\$1,629,083.00
Total expenses approved by interim orders to date:	\$36,554.44
Blended rate in this application for all attorneys:	\$638.50
Blended rate in this application for all timekeepers:	\$633.25
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$155,848.00
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed:	\$534.20
Number of professionals included in this application	8
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	3
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No.

This is a:     \_\_\_ Monthly     x Interim     \_\_\_ Final Application.

**Monthly Fee Statements (Eighth Interim Fee Period)**

February 1, 2023 through May 31, 2023

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>
March 30, 2023 [Dkt. 1967]	February 1, 2023 – February 28, 2023	\$66,481.50	\$435.30	\$53,185.20	\$435.30
May 2, 2023 [Dkt. 2070]	March 1, 2023 – March 31, 2023	\$69,618.00	\$0	\$55,694.40	\$0
May 31, 2023 [Dkt. 2126]	April 1, 2023 – April 30, 2023	\$58,710.50	\$98.90	\$46,968.40	\$98.90
June 30, 2023 [Dkt. 2223]	May 1, 2023 – May 31, 2023	\$151,579.75	\$7,084.73	Pending	Pending

**Prior Interim Fee Applications**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Approved Fees</b>	<b>Approved Expenses</b>
March 17, 2021 [Dkt. 411]	October 1, 2020 – January 31, 2021	\$175,221.50	\$265.49	\$173,471.50	\$265.49
July 19, 2021 [Dkt. 618]	February 1, 2021 – May 31, 2021	\$131,852.00	\$1,366.80	\$130,462.00	\$1,366.80
November 15, 2021 [Dkt. 849]	June 1, 2021 – September 30, 2021	\$80,481.00	\$3,696.84	\$80,481.00	\$3,696.84
March 15, 2022 [Dkt. 1011]	October 1, 2021 – January 21, 2022	\$75,804.00	\$1,078.25	\$75,804.00	\$1,078.25
July 14, 2022 [Dkt. 1198]	February 1, 2022 – May 31, 2022	\$256,054.50	\$11,902.49	\$256,054.50	\$11,902.49
November 14, 2022 [Dkt. 1444]	June 1, 2022 – September 30, 2022	\$497,990.75	\$6,395.75	\$497,990.75	\$6,395.75
March 14, 2023 [Dkt. 1809]	October 1, 2022 – January 31, 2023	\$411,679.25	\$11,848.82	\$411,679.25	\$11,848.82

**Summary of Compensation Requested by Project Category**

<b>Insurance Recovery Activities</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	132.9	\$975.00	\$129,577.50
	Jesse Bair	211.70	\$625.00	\$132,312.50
	Nathan Kuenzi	35.4	\$420.00	\$14,868.00
	Brian Cawley	58.6	\$420.00	\$24,612.00
	Leakhena Au	50.4	\$420.00	\$21,168.00
	Karen Dempksi	1.8	\$360.00	\$648.00
	Alyssa Turgeon	3.0	\$360.00	\$1,080.00
	<b>Total:</b>	<b>493.8</b>		<b>\$324,266.00</b>
<b>Fee Statements / Fee Applications</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Jesse Bair	2.2	\$625.00	\$1,375.00
	Brenda Horn-Edwards	5.5	\$360.00	\$1,980.00
	<b>Total:</b>	<b>7.7</b>		<b>\$3,355.00</b>
<b>Non-Working Travel</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	26.0	\$487.50	\$12,675.00
	Jesse Bair	19.5	\$312.50	\$6,093.75
	<b>Total:</b>	<b>45.5</b>		<b>\$18,768.75</b>

Dated: July 17, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ James I. Stang*

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*Special Insurance Counsel for the Official Committee of  
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Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Case No. 20-12345 (MG)
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THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
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Debtor. <sup>4</sup>	)	

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**EIGHTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH MAY 31, 2023**

Burns Bair LLP (“Burns Bair” or the “Firm”), special insurance counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the Debtor in the above-captioned case (the “Debtor”), hereby submits this eighth interim fee application (the “Fee Application”) for the period from February 1, 2023 through May 31, 2023 (the “Interim Compensation Period”) in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases, effective December 4, 2009 (together with the “Local Rules”, the “Local Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. §330, effective January 31, 1996 (the “U.S. Trustee Guidelines”), and this Court’s Order Authorizing and Approving The Official Committee of Unsecured Creditors’ Application to Retain and

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<sup>4</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket No. 246]. Burns Bair requests compensation in the amount of \$346,389.75 for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair during the Interim Compensation Period and reimbursement of actual and necessary costs and expenses in the amount of \$7,618.93 incurred by Burns Bair during the Interim Compensation Period. In support of this Fee Application, Burns Bair submits the declaration of Timothy W. Burns (the “Burns Declaration”) attached hereto as **Exhibit A** and incorporated herein by reference. In further support of the Application, Burns Bair respectfully represents as follows:

**Preliminary Statement**

1. During the Interim Compensation Period, Burns Bair represented, advised, and assisted the Committee in fulfilling its statutory obligations and duties to unsecured creditors and rendered services to the Committee in accordance with its instructions and directions. By this Fee Application, Burns Bair requests that the Court authorize the interim allowance and payment of fees and expenses incurred by Burns Bair during the Interim Compensation Period in the total amount of \$354,008.68 as compensation for services rendered to the Committee.

2. To date, Burns Bair has been paid a total of \$156,382.20, comprising (a) compensation of \$155,848.00, representing 80% of its fees incurred during the Interim Compensation Period; and (b) reimbursement of \$534.20, representing 100% of its actual and necessary expenses incurred during the Interim Compensation Period.<sup>5</sup> By this Fee Application, Burns Bair seeks interim allowance and payment of all compensation for services rendered during the Interim Compensation Period.

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<sup>5</sup> These figures do not incorporate the amounts incurred for May time, which were included in Burns Bair’s monthly fee submission filed on June 30, 2023, [Dkt. 2223]. As of the date of filing of this 8<sup>th</sup> Interim Application, Burns Bair has not yet received payment for those amounts.

### **Jurisdiction and Basis for Relief**

3. This Court has jurisdiction to hear and determine this Fee Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. Sections 328(a), 330, and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014 are the statutory predicates for the relief sought by this Fee Application.

### **Background**

4. On October 1, 2020 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the Bankruptcy Court for the Southern District of New York. The Debtor is operating its business and managing its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

5. On October 16, 2020, the Office of the United States Trustee (the “UST”) appointed the Committee pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of nine individuals who hold claims against the Debtor, including eight individuals who were sexually abused as minors by perpetrators for whom the Debtor was responsible and one representative of a minor with a civil rights claim against the Debtor.

#### **A. Burns Bair Retention**

6. Following the Committee’s appointment, the Committee determined it needed special insurance counsel and, subject to Court approval, hired Burns Bair on October 29, 2020.

7. On November 20, 2020, the Committee filed The Official Committee of Unsecured Creditors’ Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 (the “Retention Application”). As set forth in the Retention



Application, the Committee selected Burns Bair to provide the following services to the Committee:

- i. Analyzing, investigating, and assessing the availability of coverage under the Diocese's insurance policies;
- ii. Representing the Committee in the adversary proceeding the Diocese filed against its insurers, Adv. Pro. No. 20-01227, *The Roman Catholic Diocese of Rockville Centre, New York v. Arrowood Indemnity Co. fka Royal Insurance Co., et al.*;
- iii. Engaging in potential mediation and/or other resolution of the claims, demands, and/or lawsuits related to the Diocese's insurance policies;
- iv. Advising, negotiating, and advocating on behalf of the Committee with respect to the Diocese's insurance policies; and;
- v. Providing related advice and assistance to the Committee as necessary.

8. On December 9, 2020, the Court entered the Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020 [Docket 246] (the "Retention Order"). The Retention Order provides that all compensation and reimbursement of costs and expenses incurred during Burns Bair's employment be paid only after appropriate application and approval of this Court.

**B. Compensation Paid and Its Source**

9. All services for which Burns Bair requests compensation were performed for or on behalf of the Committee. Burns Bair has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Burns Bair and any other person other than the partners of Burns Bair for the sharing of compensation to be received for services rendered in these cases. Burns Bair has not received a retainer in these cases.

**C. Monthly Fee Statements for the Interim Compensation Period**

10. Burns Bair has filed and served the following monthly fee statements for the period February 1, 2023 through May 31, 2023, pursuant to the Interim Compensation Order. To date, no objections to the Prior Monthly Statements have been filed.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
March 30, 2023 [Dkt. 1967]	February 1, 2023 – February 28, 2023	\$66,481.50	\$435.30	\$53,185.20	\$435.30
May 2, 2023 [Dkt. 2070]	March 1, 2023 – March 31, 2023	\$69,618.00	\$0	\$55,694.40	\$0
May 31, 2023 [Dkt. 2126]	April 1, 2023 – April 30, 2023	\$58,710.50	\$98.90	\$46,968.40	\$98.90
June 30, 2023 [Dkt. 2223]	May 1, 2023 – May 31, 2023	\$151,579.75	\$7,084.73	Pending	Pending

11. The fees requested are reasonable, and all amounts requested were for actual and necessary services rendered on behalf of the Committee.

**Statement of Services Rendered and Time Expended**

12. **Exhibit B** sets forth a timekeeper summary that includes the respective names, positions, bar admissions, hourly billing rates and aggregate hours spent by each Burns Bair professional and paraprofessional that provided services to the Committee during the Interim Compensation Period. The rates charged by Burns Bair for services rendered to the Committee are the same rates that Burns Bair charges generally for professional services rendered to its non-bankruptcy clients.

13. **Exhibit C** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Burns Bair in connection with services rendered to the Committee during the Interim Compensation Period.

14. **Exhibit D** sets forth a summary of compensation requested by project category.

15. **Exhibit E** is a chart setting forth the Customary and Comparable Compensation Disclosures.

16. Burns Bair's invoices for the Interim Compensation Period were attached as exhibits to the Prior Monthly Statements [Docket Nos. 1967, 2070, 2126, and 2223].

**Services Rendered and Disbursements Incurred During the Interim Compensation Period**

17. During the Interim Compensation Period, Burns Bair expended a considerable number of hours on behalf of the Committee including, but not limited to, preparing for and participating in multiple, in-person and telephonic mediation sessions; drafting insurance presentations for use during same; assisting in preparing the Committee's mediation statement; preparing for and deposing the Diocese's preliminary injunction insurance witness; editing and revising trial cross-examination outline for same; drafting revised insurance sections of the Committee's preliminary injunction opposition brief; analysis and work regarding preparations of the Committee's preliminary injunction insurance exhibits; continued analysis of the insurance impacts, if any, of prosecution of each individual CVA action in connection with the Diocese's preliminary injunction motion; reviewing and analyzing the Diocese's preliminary injunction insurance document production; research regarding Section 3420 notice letters and drafting same on behalf of the Committee to the Diocese's insurers; research and analysis of insurance issues concerning the Committee's motion to dismiss, including editing and revising the Committee's motion to dismiss, a memorandum in connection with same, and the Committee's responses to the Diocese's insurance-related motion to dismiss discovery requests; analysis regarding recent Boy Scouts of America decision and assessing potential impact, if any, on insurance issues in the DRVC case; continued analysis of the Diocese's historical insurance program; presenting to the Committee on insurance strategy; analysis and consideration of the insurance impacts, if any, of

the Debtor's claims objections and state court counsel's responses to same; analysis of insurance issues in connection with the Debtor's proposed Plan; detailed research in connection with insurance issues impacting the Committee Plan; drafting insurance sections of the Amended Committee Plan and Disclosure Statement, including associated exhibits; work with the Committee's claim valuation experts on issues impacting individual insurer exposures and related issues; detailed research and analysis of issues concerning Arrowood, including its financial condition, claims handling practices, and potential regulatory and litigation options the Committee may have to remedy same, including drafting of proposed complaint against Arrowood concerning its unfair claims handling practices; correspondence and conferences with the Debtor's insurance counsel regarding various case insurance issues, including mediation and discovery issues in the insurance district court actions; and formulating overall insurance strategy on behalf of the Committee. These tasks are not meant to be a detailed description of all work performed.

18. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Burns Bair is fair and reasonable given (a) the complexity of the cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the Local Rules, the Local Guidelines, and the Interim Compensation Order, and believes that this Application complies with such rule and order.

**Actual and Necessary Expenses Incurred by Burns Bair**

19. As summarized in **Exhibit C** attached hereto, Burns Bair has incurred a total of \$7,618.93 in expenses on behalf of the Committee during the Interim Compensation Period for which it seeks reimbursement.

**Allowance of Compensation**

20. Section 330(a)(1)(A) of the Bankruptcy Code provides that the Court may award to a professional person, “reasonable compensation for actual, necessary services rendered.” 11 U.S.C. § 330(a)(1)(A). Section 330(a)(3)(A), in turn, provides that in determining the amount of reasonable compensation to be awarded, the Court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:

- i. The time spent on such services;
- ii. The rates charges for such services;
- iii. Whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of, a case under this title;
- iv. Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- v. Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3)(A).

21. The congressional policy expressed above provides for adequate compensation in order to continue to attract qualified and competent professionals to bankruptcy cases. Burns Bair respectfully submits that the consideration of these factors should result in this Court’s allowance of the full compensation sought.

### **Time and Labor Required**

22. During the Interim Compensation Period, the Committee relied heavily on the experience and expertise of Burns Bair when dealing with the matters described herein. As a result, Burns Bair devoted significant time and effort to perform properly and expeditiously the required professional services. During the Interim Compensation Period, Burns Bair expended 547 hours in providing the requested professional services. Burns Bair's hourly billing rate is based on Burns Bair's normal billing rates for services of this kind and is competitive with other advisory firms.

### **Necessity of Burns Bair's Services**

23. This bankruptcy case addresses issues that raise complex questions and require a high level of skill and expertise to efficiently and accurately address. The professional services described herein were performed by Burns Bair to, among other things, ensure that the Roman Catholic Diocese of Rockville Centre, New York's over 60 years of insurance policies, including both primary and excess coverage, are fully available to compensate the sexual abuse survivors.

### **Experience and Ability of the Professionals**

24. Burns Bair has extensive experience in complex insurance disputes and contested issues, including coverage litigation, insurance class actions, counterparty disputes with insurers, and domestic and international insurance arbitration. Additionally, Burns Bair has extensive experience advising and working in concert with other attorneys to navigate discrete insurance issues in the context of complex litigation proceedings. Burns Bair has successfully recovered substantial insurance proceeds in other actions involving insurance disputes arising from sexual abuse allegations involving Catholic dioceses.

**Reservation of Rights**

25. It is possible that some professional time expended or expenses incurred by Burns Bair during the Application Period are not reflected in this Application. Burns Bair reserves the right to include such amounts in future fee applications.

**Notice**

26. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this Fee Application upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). No other or further notice need be provided.

**Conclusion**

27. Burns Bair respectfully requests that the Court enter an order, in the form attached hereto, (a) granting the relief requested in this Fee Application; (b) allowing (i) Burns Bair interim fees in the total amount of \$346,389.75 for services rendered in the Chapter 11 cases, and (ii) reimbursement of actual and necessary costs and expenses in the amount of \$7,618.93 during the Interim Compensation Period; (c) award and order to be paid to Burns Bair the balance of any such fees that remain unpaid, after deducting interim payments already received by Burns Bair pursuant to the Interim Compensation Order; and (d) granting such further relief as is just and proper.

Dated: July 17, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ James I. Stang*

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*Counsel for the Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese  
of Rockville Centre, New York*

**BURNS BAIR LLP**

*/s/ Timothy W. Burns*

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*Special Insurance Counsel for the Official Committee of  
Unsecured Creditors of The Roman Catholic Diocese of  
Rockville Centre, New York*



## **EXHIBIT A**

### **Declaration of Timothy W. Burns**

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Counsel for the Official Committee  
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Catholic Diocese  
of Rockville Centre, New York

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (MG)
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THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	

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**DECLARATION OF TIMOTHY W. BURNS IN SUPPORT OF  
EIGHTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH MAY 31, 2023**

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

I, Timothy W. Burns, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016 of the Local Rules for the Bankruptcy Court for the Southern District of New York that the following is true and correct:

i. I am a partner with the law firm of Burns Bair LLP (“Burns Bair” or the “Firm”), with offices located at 10 E. Doty Street, Suite 600, Madison, WI 53703. I am duly admitted to practice law in, among other places, the States of Wisconsin, Illinois, and Missouri.

ii. I have personally reviewed the information contained in the Application and believe its contents to be true and correct to the best of my knowledge, information, and belief. In addition, I believe that the Application complies with the Local Rules for the Southern District of New York and the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases*.

iii. All services for which Burns Bair requests compensation were performed for or on behalf of the Committee. Burns Bair has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Burns Bair and any other person other than the partners of Burns Bair for the sharing of compensation to be received for services rendered in these cases. Burns Bair has not received a retainer in these cases.

iv. Burns Bair makes the following disclosures pursuant to the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013*.

v. The Court authorized the Committee to retain Burns Bair as their special insurance counsel in this chapter 11 case pursuant to the *Order Authorizing and Approving The Official Committee of Unsecured Creditors' Application to Retain and Employ Burns Bair LLP as Special Insurance Counsel Effective as of October 29, 2020* (the "Retention Order") [Docket 246]. The billing rates in this Application are those disclosed and approved at retention.

vi. Five professionals and three paraprofessionals are included in this Application. Of those professionals, three billed fewer than 15 hours during the Interim Compensation Period.

vii. In accordance with the U.S. Trustee Guidelines, Burns Bair responds to the questions identified therein as follows:

Question 1: Did Burns Bair agree to any variations from, or alternatives to, Burns Bair's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Answer: Yes. I, Timothy W. Burns, agreed to reduce my hourly rate in this matter from my standard hourly rate of \$1090 per hour to \$975 per hour.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did Burns Bair discuss the reasons for the variation with the client?

Answer: N/A.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No.

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices?

Answer: Yes, a relatively small amount of time was incurred preparing and reviewing Burns Bair's fee applications and associated exhibits, which included Burns Bair's invoices. No amount of time was incurred preparing or revising invoices other than in connection with Burns Bair's fee applications.

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No.

Question 6: Does the Application include any rate increases since Burns Bair's retention in these cases?

Answer: No.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 17, 2023

/s/ Timothy W. Burns

Timothy W. Burns

## **EXHIBIT B**

### **Timekeeper Summary**

**EXHIBIT B**

**Timekeeper Summary**

<b>Professional</b>	<b>Title</b>	<b>Year of Bar Admission</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy W. Burns	Partner	1991	\$975.00	132.90	\$129,577.50
Timothy W. Burns – Travel Rate			\$487.50	26	\$12,675.00
Jesse J. Bair	Partner	2013	\$625.00	213.90	\$133,687.50
Jesse J. Bair – Travel Rate			\$312.50	19.50	\$6,093.75
Brian P. Cawley	Associate	2020	\$420.00	58.60	\$24,612.00
Nathan M. Kuenzi	Associate	2020	\$420.00	35.40	\$14,868.00
Leakhena Au	Associate	2020	\$420.00	50.40	\$21,168.00
Alyssa Turgeon	Paralegal	N/A	\$360.00	3.00	\$1,080.00
Brenda Horn-Edwards	Paralegal	N/A	\$360.00	5.50	\$1,980.00
Karen Dempski	Paralegal	N/A	\$360.00	1.80	\$648.00
<b>Total</b>				<b>547.00</b>	<b>\$346,389.75</b>
<b>Average Billing Rate (Attorneys Only)</b>			<b>\$522.86</b>		

## **EXHIBIT C**

### **Expense Summary**



## EXHIBIT C

### Expense Summary

Date	Expense	Total Expenses
2/9/2023	Wisconsin Certificate of Good Standing, J. Bair	\$3.05
2/9/2023	Illinois Certificate of Good Standing, T. Burns	\$16.00
2/9/2023	Missouri Certificate of Good Standing, T. Burns	\$16.25
2/16/2023	Pro Hac Vice Admission, J. Bair	\$200.00
2/24/2023	Pro Hac Vice Admission, T. Burns	\$200.00
4/1/2023	First Quarter 2023 PACER	\$98.90
5/9/2023	Taxi, J. Bair (airport to hotel)	\$83.29
5/9/2023	Hotel, T. Burns (1 night)	\$644.21
5/9/2023	Travel meal, T. Burns	\$10.82
5/9/2023	United Airlines, T. Burns (May 9-10, ORD-LGA)	\$374.70
5/9/2023	Hotel, J. Bair (1 night)	\$485.46
5/9/2023	Travel meal, J. Bair	\$16.33
5/9/2023	Delta Airlines, J. Bair (May 9-10, MSN-LGA)	\$269.70
5/9/2023	Delta Airlines WiFi, J. Bair	\$9.95
5/10/2023	Delta Airlines WiFi, J. Bair	\$15.95
5/10/2023	Travel meal, T. Burns	\$36.30
5/10/2023	Travel meals, J. Bair	\$20.73
5/10/2023	Airport parking, J. Bair	\$20.00
5/16/2023	Westlaw, legal charges to obtain exhibits from Delaware Court in Arrowood mandamus action	\$697.00
5/18/2023	Taxi, J. Bair (airport to hotel)	\$99.96
5/18/2023	Taxi, T. Burns (airport to hotel)	\$127.00
5/18/2023	United Airlines, T. Burns (May 18-19, MSN-EWR)	\$927.80
5/18/2023	Delta Airlines, J. Bair (May 18-19, MSN-LGA)	\$1,037.10
5/18/2023	Delta Airlines WiFi, J. Bair	\$4.95
5/18/2023	United Airlines WiFi, T. Burns	\$8.00
5/18/2023	Hotel, T. Burns (1 night)	\$670.31
5/18/2023	Hotel, J. Bair (1 night)	\$670.31
5/19/2023	Airport parking, J. Bair	\$20.00
5/19/2023	Hotel, T. Burns (1 additional night)	\$670.31
5/19/2023	Uber, J. Bair (mediation to airport)	\$125.96
5/20/2023	United Airlines WiFi, T. Burns	\$8.00
5/20/2023	Travel meal, T. Burns	\$30.59
	<b>TOTAL:</b>	<b>\$7,618.93</b>

## **EXHIBIT D**

### **Summary of Compensation Requested by Project Category**

**EXHIBIT D**

**Summary of Compensation Requested by Project Category**

<b>Insurance Recovery Activities</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	132.9	\$975.00	\$129,577.50
	Jesse Bair	211.70	\$625.00	\$132,312.50
	Nathan Kuenzi	35.4	\$420.00	\$14,868.00
	Brian Cawley	58.6	\$420.00	\$24,612.00
	Leakhena Au	50.4	\$420.00	\$21,168.00
	Karen Dempski	1.8	\$360.00	\$648.00
	Alyssa Turgeon	3.0	\$360.00	\$1,080.00
	<b>Total:</b>	<b>493.8</b>		<b>\$324,266.00</b>
<b>Fee Statements / Fee Applications</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Jesse Bair	2.2	\$625.00	\$1,375.00
	Brenda Horn-Edwards	5.5	\$360.00	\$1,980.00
	<b>Total:</b>	<b>7.7</b>		<b>\$3,355.00</b>
<b>Non-Working Travel</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
	Timothy Burns	26.0	\$487.50	\$12,675.00
	Jesse Bair	19.5	\$312.50	\$6,093.75
	<b>Total:</b>	<b>45.5</b>		<b>\$18,768.75</b>

## **EXHIBIT E**

### **Compensation Disclosures**

**EXHIBIT E****CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS**

(See Guidelines C.3. for definitions of terms used in this Exhibit.)

<b>CATEGORY OF TIMEKEEPER</b> <b>(Using categories already maintained by the firm)</b>		<b>BLENDED HOURLY RATE</b>	
		<b>BILLED</b> <b>Firm timekeepers for preceding</b> <b>year, excluding bankruptcy*</b>	<b>BILLED</b> <b>In this fee application</b>
	Sr./Equity Partner/Shareholder	\$808.75	\$718.92
	Of Counsel	N/A	N/A
	Associate	\$420.00	\$420.00
	Paralegal	\$360.00	\$360.00
	Case Management Assistants	N/A	N/A
	All Timekeepers Aggregated	\$550.45	\$633.25

\* Represents approximate blended hourly rate for all firm timekeepers in non-bankruptcy cases for calendar year 2022. Please also note that approximately 50% of Burns Bair's hours for calendar year 2022 consisted of hours worked in contingent matters, meaning that Burns Bair tracked the hours worked (and the corresponding hourly rate) but did not bill those hours to the client.

Case Name: The Roman Catholic Diocese of Rockville Centre, New York

Case Number: 20-12345 (MG)

Applicant's Name: Burns Bair LLP

Date of Application: July 17, 2023

Interim or Final: Interim

## **EXHIBIT F**

### **Invoices**

**EXHIBIT F**  
Pg 31 of 88**Burns | Bair**10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre****Issue Date :** 3/21/2023**Bill # :** 01072**Matter:** Insurance**PROFESSIONAL SERVICES RENDERED**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
2/1/2023	Leakhena Au	Supplemental analysis re additional insured entities under Ecclesia policies in connection with Plan issues (1.9);	1.90	\$798.00
2/1/2023	Jesse Bair	Analyze Ecclesia other insured entities (.2); provide instructions to L. Au re additional analysis needed in connection with same (.1); participate in call with B. Michael re same (.2);	0.50	\$312.50
2/1/2023	Timothy Burns	Review correspondence between PSZJ and BB teams re Committee Plan exhibits (.2);	0.20	\$195.00
2/1/2023	Jesse Bair	Correspondence with Evanston and the Debtor re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/1/2023	Timothy Burns	Conference with L. Au re potential direct claims against the Diocese's insurers (.1);	0.10	\$97.50
2/1/2023	Jesse Bair	Review G. Greenwood correspondence re finalization of Committee preliminary injunction discovery responses (.1);	0.10	\$62.50
2/1/2023	Jesse Bair	Participate in call with PSZJ team re Plan exhibits (.8);	0.80	\$500.00
2/1/2023	Jesse Bair	Analyze and respond to state court counsel question re Debtor Plan insurance issues (.2);	0.20	\$125.00
2/1/2023	Jesse Bair	Draft amended version of the insurance policies Plan exhibit (.6);	0.60	\$375.00
2/1/2023	Jesse Bair	Review information re PSIP participants in connection with other insured entities analysis (.2);	0.20	\$125.00
2/1/2023	Timothy Burns	Review email from B. Michael re monthly operating report and related filings (.1);	0.10	\$97.50
2/1/2023	Leakhena Au	Continue analyzing case law re particular elements of potential direct claims against the Diocese's insurers (1.8);	1.80	\$756.00
2/1/2023	Timothy Burns	Review correspondence between BB and opposing counsel re intervention in Evanston adversary proceeding (.2);	0.20	\$195.00

2/1/2023	Jesse Bair	Review and edit revised version of the Amended Committee Plan (.7);	0.70	\$437.50
2/1/2023	Jesse Bair	Review the parties' joint sealing request re the Agreed Coverage Summary (.1); review correspondence with the Debtor and Court re same (.1);	0.20	\$125.00
2/1/2023	Jesse Bair	Review revised version of the Committee Trust Agreement (.3);	0.30	\$187.50
2/2/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy and potential next-steps (.2);	0.20	\$125.00
2/2/2023	Jesse Bair	Review most recent iteration of the Committee amended Plan (.5); draft proposed additional insurance language for inclusion in same (.2);	0.70	\$437.50
2/2/2023	Leakhena Au	Continue drafting memorandum re potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/2/2023	Leakhena Au	Continue drafting revised version of memorandum re potential direct claims against the Diocese's insurers (.9);	0.90	\$378.00
2/2/2023	Jesse Bair	Review Debtor information re SIRs for non-abuse claims (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review revised version of the Committee Disclosure Statement (.5);	0.50	\$312.50
2/2/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re potential abuse claims reviewers (.1);	0.10	\$62.50
2/2/2023	Jesse Bair	Review correspondence with B. Michael re additional revised insurance language for Amended Committee Plan (.1);	0.10	\$62.50
2/2/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy and potential next-steps (.2);	0.20	\$195.00
2/2/2023	Jesse Bair	Review revised version of Committee work-in-progress list (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction request for admission responses (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction requests for production responses (.1);	0.10	\$62.50
2/3/2023	Leakhena Au	Analysis re potential revisions to memorandum re potential direct claims against the Diocese's insurers (.2);	0.20	\$84.00
2/3/2023	Jesse Bair	Review B. Michael correspondence to the Committee re the Committee's First Amended Plan and Disclosure Statement (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review Arrowood's amended answer, affirmative defenses, and counterclaim (.7);	0.70	\$437.50
2/3/2023	Timothy Burns	Review the Committee's amended disclosure statement (.4);	0.40	\$390.00
2/3/2023	Jesse Bair	Review B. Michael correspondence re draft allocation protocols (.1);	0.10	\$62.50
2/3/2023	Jesse Bair	Review final version of the Committee's preliminary injunction discovery responses to the Diocese (.1);	0.10	\$62.50



2/3/2023	Jesse Bair	Review the Diocese's preliminary injunction interrogatory responses (.2);	0.20	\$125.00
2/3/2023	Jesse Bair	Review the Diocese's answer to Arrowood's amended counterclaim (.2);	0.20	\$125.00
2/3/2023	Jesse Bair	Review Order granting the parties' joint motion to seal and redacted Agreed Coverage Summary (.1);	0.10	\$62.50
2/3/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re Committee plan disclosure issues (.2);	0.20	\$195.00
2/3/2023	Jesse Bair	Participate in state court counsel meeting re ongoing case issues (1.2);	1.20	\$750.00
2/3/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/3/2023	Karen DempSKI	Download/upload recently produced Diocesan discovery production (.4);	0.40	\$144.00
2/3/2023	Leakhena Au	Continue analyzing legal issues in connection with potential direct claims against the Diocese's insurers (1.1);	1.10	\$462.00
2/3/2023	Timothy Burns	Review emails between PSZJ and BB re first amended plan draft (.2);	0.20	\$195.00
2/3/2023	Timothy Burns	Participate in state court counsel meeting re ongoing case issues (1.2);	1.20	\$1,170.00
2/3/2023	Timothy Burns	Review correspondence from PSZJ to the Committee re amended disclosure statement (.1);	0.10	\$97.50
2/5/2023	Jesse Bair	Analyze and respond to K. Brown question re Diocese preliminary injunction responses re Arrowood (.2);	0.20	\$125.00
2/6/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (1.2);	1.20	\$504.00
2/6/2023	Jesse Bair	Review the Diocese's omnibus objection to released or dismissed claims (.2); review associated Renker declaration (.1);	0.30	\$187.50
2/6/2023	Leakhena Au	Participate in internal BB team conference re assignments and case developments (.1);	0.10	\$42.00
2/6/2023	Nathan Kuenzi	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$42.00
2/6/2023	Nathan Kuenzi	Analyze POC information in connection with ongoing case insurance issues (.4);	0.40	\$168.00
2/6/2023	Timothy Burns	Participate in internal BB team conference re assignments and case developments (.1);	0.10	\$97.50
2/6/2023	Brian Cawley	Participate in team meeting regarding case status and assignments (.1);	0.10	\$42.00
2/6/2023	Alyssa Turgeon	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$36.00
2/6/2023	Leakhena Au	Continue analyzing legal issues in connection with potential direct claims against the Diocese's insurers (1.1);	1.10	\$462.00
2/6/2023	Jesse Bair	Participate in internal BB team conference re case status and associated research projects (.1);	0.10	\$62.50

2/6/2023	Jesse Bair	Review the Debtor's omnibus objection to duplicate or amended claims (.2);	0.20	\$125.00
2/7/2023	Timothy Burns	Review claim withdrawal filed by particular state court counsel.1);	0.10	\$97.50
2/7/2023	Jesse Bair	Correspondence with Evanston re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/7/2023	Leakhena Au	Continue analyzing factual information regarding potential direct claims against the Diocese's insurers (2.0);	2.00	\$840.00
2/7/2023	Timothy Burns	Review emails between BB and PSZJ re preliminary injunction opposition brief edits (.1);	0.10	\$97.50
2/7/2023	Jesse Bair	Provide instructions to B. Horn re preparing draft of BB's seventh interim fee application (.1);	0.10	\$62.50
2/7/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re potential Department of Education counter (.1);	0.10	\$62.50
2/7/2023	Jesse Bair	Review correspondence from the Court and K. Brown re February 21 Plan-related status conference (.1);	0.10	\$62.50
2/7/2023	Timothy Burns	Review PSIP monthly information received from the Diocese (.1);	0.10	\$97.50
2/7/2023	Timothy Burns	Review correspondence from B. Michael to Committee re DOE settlement discussions (.1);	0.10	\$97.50
2/7/2023	Leakhena Au	Draft revised memorandum re potential direct claims against the Diocese's insurers in light of supplemental research results (1.8);	1.80	\$756.00
2/7/2023	Jesse Bair	Review debtor monthly PSIP information (.1);	0.10	\$62.50
2/7/2023	Leakhena Au	Review insurer coverage position letters in connection with potential direct claims against the Diocese's insurers (1.0);	1.00	\$420.00
2/8/2023	Jesse Bair	Correspondence with Evanston re Committee reinstatement as a party in the Evanston district court action (.1);	0.10	\$62.50
2/8/2023	Nathan Kuenzi	Begin supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (2.2);	2.20	\$924.00
2/8/2023	Jesse Bair	Review notice of hearing re February 21 status conference (.1);	0.10	\$62.50
2/8/2023	Nathan Kuenzi	Participate in conference with J. Bair re preliminary injunction state court action insurance impacts, if any, and supplemental analysis needed in connection with same (.2);	0.20	\$84.00
2/8/2023	Jesse Bair	Draft proposed stipulation and Order reinstating the Committee as a party in the Evanston district court action (.3); correspondence with PSZJ team re same (.1);	0.40	\$250.00

2/8/2023	Jesse Bair	Review and respond to correspondence with G. Greenwood re preliminary injunction state court action insurance impacts (.2); participate in conference with N. Kuenzi re supplemental analysis needed in connection with same (.2);	0.40	\$250.00
2/9/2023	Jesse Bair	Review and respond to correspondence with I. Nasatir and K. Brown re upcoming preliminary injunction depositions (.2);	0.20	\$125.00
2/9/2023	Jesse Bair	Review correspondence from B. Michael re the Diocese's most recent round of claim objections (.1);	0.10	\$62.50
2/9/2023	Nathan Kuenzi	Continue supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (1.9);	1.90	\$798.00
2/9/2023	Jesse Bair	Review portion of the Diocese's recent preliminary injunction document production (.1);	0.10	\$62.50
2/9/2023	Jesse Bair	Correspondence with Evanston and the Debtor re draft stipulation and Order reinstating the Committee as a party in the Evanston district court action (.1);	0.10	\$62.50
2/9/2023	Karen DempSKI	Draft pro hac vice submissions for T. Burns and J. Bair in the Evanston district court action (.8);	0.80	\$288.00
2/9/2023	Jesse Bair	Review agenda for upcoming state court counsel meeting (.1);	0.10	\$62.50
2/10/2023	Nathan Kuenzi	Continue supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (3.0);	3.00	\$1,260.00
2/10/2023	Jesse Bair	Review correspondence with K. Brown and the Diocese re upcoming preliminary injunction depositions (.1);	0.10	\$62.50
2/11/2023	Timothy Burns	Review recent NY court decision on negligent retention and supervision claims re sexual abuse (.3);	0.30	\$292.50
2/11/2023	Timothy Burns	Review email between B. Michael and state court counsel re preliminary injunction briefing issues (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review debtor's fifth omnibus objection and supporting declaration (.2);	0.20	\$195.00
2/11/2023	Timothy Burns	Review Cemetery tolling stipulation and notice (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence from E. Stephens re preliminary injunction deposition scheduling and topics of diocesan witnesses (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence between PSZJ and BB re claims objections (.2);	0.20	\$195.00
2/11/2023	Timothy Burns	Review draft claims objection response (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review email from B. Michael re claims objections procedures (.1);	0.10	\$97.50
2/11/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re potential plan trustees (.1);	0.10	\$97.50
2/12/2023	Jesse Bair	Correspondence with I. Nasatir and B. Michael re insurance impacts, if any, of certain Diocese claims objections (.1); correspondence with T. Burns re same (.1);	0.20	\$125.00

2/12/2023	Jesse Bair	Analysis re strategy for upcoming insurance-related preliminary injunction depositions (.2);	0.20	\$125.00
2/12/2023	Jesse Bair	Review first amended stipulated tolling agreements with the DOE, Seminary, and Gemco (.1);	0.10	\$62.50
2/12/2023	Jesse Bair	Review the Diocese's fifth omnibus claims objection (.2); review Renker declaration in support of same (.1);	0.30	\$187.50
2/12/2023	Jesse Bair	Analysis re insurer information in connection with claim objection issues (.5); correspondence with B. Michael re same (.1);	0.60	\$375.00
2/12/2023	Jesse Bair	Review correspondence from the Committee re ongoing case issues (.1);	0.10	\$62.50
2/13/2023	Jesse Bair	Conference with T. Burns re insurance impacts, if any, of certain Diocese claims objections (.2);	0.20	\$125.00
2/13/2023	Timothy Burns	Participate in call with J. Bair re insurance impacts, if any, of certain Diocese claims objections (.2);	0.20	\$195.00
2/13/2023	Jesse Bair	Review email summary from N. Kuenzi re supplemental analysis of CVA action insurance impacts (.1); participate in conference with N. Kuenzi re same and additional analysis needed in connection with the Committee's preliminary injunction opposition brief (.4);	0.50	\$312.50
2/13/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
2/13/2023	Nathan Kuenzi	Additional analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (4.8);	4.80	\$2,016.00
2/13/2023	Jesse Bair	Review correspondence with state court counsel re future claim issues (.1);	0.10	\$62.50
2/13/2023	Nathan Kuenzi	Prepare for meeting with J. Bair (.1); participate in conference with J. Bair re additional analysis needed in connection with the Committee's preliminary injunction opposition brief (.4);	0.50	\$210.00
2/14/2023	Jesse Bair	Participate in call with N. Kuenzi re results of supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.1);	0.10	\$62.50
2/14/2023	Timothy Burns	Participate in portion of Committee meeting re plan issues (.6);	0.60	\$585.00
2/14/2023	Nathan Kuenzi	Finalize supplemental analysis re the impact, if any, of prosecution of particular state court actions in connection with preliminary injunction briefing (4.5);	4.50	\$1,890.00
2/14/2023	Jesse Bair	Analyze email memorandum from N. Kuenzi re supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.2);	0.20	\$125.00
2/14/2023	Nathan Kuenzi	Prepare for meeting with J. Bair (.1); participate in conference with J. Bair re supplemental analysis re insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.1);	0.20	\$84.00
2/14/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing Plan issues (.2);	0.20	\$125.00

2/14/2023	Jesse Bair	Review and edit proposed stipulation and order reinstating the Committee as a party in the Evanston district court action (.1);	0.10	\$62.50
2/14/2023	Jesse Bair	Draft letter to the Court regarding the Committee's reinstatement as party in the Evanston district court action (.4); correspondence with the Debtor and Evanston re same (.1);	0.50	\$312.50
2/14/2023	Jesse Bair	Additional analysis re the insurance impact, if any, of litigation of particular state court actions again non-debtor co-defendants (.2); draft correspondence to G. Greenwood summarizing findings re same (.3);	0.50	\$312.50
2/14/2023	Jesse Bair	Review and edit draft pro hac vice submissions in the Evanston district court action (.1);	0.10	\$62.50
2/14/2023	Jesse Bair	Review correspondence with state court counsel re future claim issues (.1);	0.10	\$62.50
2/15/2023	Timothy Burns	Participate in call with J. Bair re preliminary injunction hearing and related deposition strategy (.2);	0.20	\$195.00
2/15/2023	Jesse Bair	Participate in conference with G. Greenwood re preliminary injunction insurance issues (.2); review follow-up correspondence with G. Greenwood re same (.1);	0.30	\$187.50
2/15/2023	Jesse Bair	Correspondence with PSZJ re upcoming preliminary injunction depositions (.2); participate in call with T. Burns re preliminary injunction hearing and related deposition strategy (.2);	0.40	\$250.00
2/15/2023	Jesse Bair	Review B. Michael correspondence re February 21 Plan-related status conference (.1);	0.10	\$62.50
2/15/2023	Jesse Bair	Review recent appellate decision re insurer lack of standing to object to post-confirmation litigation trust (.5);	0.50	\$312.50
2/15/2023	Timothy Burns	Brief review of recent appellate decision re insurance neutrality of Plan issues (.2);	0.20	\$195.00
2/16/2023	Jesse Bair	Review Committee draft deposition notices to Porter, Moore, and Stephens (.1);	0.10	\$62.50
2/16/2023	Brenda Horn	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
2/16/2023	Brenda Horn	Draft BB seventh interim fee application (1.2), revise declaration of T. Burns re same (.2); draft related exhibits (.8); correspond with J. Bair re same (.1);	2.30	\$828.00
2/16/2023	Karen Dempski	Finalize and file pro hac vice submissions in Evanston district court action (.2); email J. Bair re same (.1);	0.30	\$108.00
2/16/2023	Jesse Bair	Participate in state court counsel meeting re Plan and other ongoing case issues (1.0);	1.00	\$625.00
2/16/2023	Jesse Bair	Correspondence with Evanston and the Diocese re finalization of Committee reinstatement stipulation and letter to the Court (.1); correspondence with K. Dempski re finalizing and filing same and J. Bair pro hac vice materials (.1);	0.20	\$125.00

2/16/2023	Jesse Bair	Review the Diocese's amended complaint in the LMI district court action (.3); review LMI and Interstate's motions for extension to respond to same (.1);	0.40	\$250.00
2/16/2023	Jesse Bair	Correspondence with B. Horn re BB's seventh interim fee application (.1);	0.10	\$62.50
2/16/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.2);	0.20	\$125.00
2/16/2023	Jesse Bair	Participate in weekly conference with PSZJ team re case strategy and ongoing litigation tasks (.9);	0.90	\$562.50
2/17/2023	Jesse Bair	Review the Committee's motion to amend the claim objection procedures and notice of hearing re same (.2);	0.20	\$125.00
2/17/2023	Jesse Bair	Review various correspondence with B. Michael and state court counsel re future claim and Plan issues (.2);	0.20	\$125.00
2/18/2023	Timothy Burns	Review correspondence between PSZJ and state court counsel re future claims representative issues (.2);	0.20	\$195.00
2/19/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re future claim issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Review B. Michael correspondence re claim objection issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re future claim and Plan issues (.1);	0.10	\$62.50
2/20/2023	Jesse Bair	Analyze recent New York decision re negligent supervision liability for sexual abuse claims (.4).	0.40	\$250.00
2/21/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
2/21/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing case issues (.5);	0.50	\$312.50
2/21/2023	Jesse Bair	Review Order granting LMI and Lexington's motion for extension of time to respond to the Diocese's amended complaint (.1);	0.10	\$62.50
2/21/2023	Timothy Burns	Participate in portion of Committee meeting re ongoing case issues (.7);	0.70	\$682.50
2/21/2023	Jesse Bair	Attend court status hearing re competing Plans (.7); participate in post-hearing conference with T. Burns re outcome of same and potential next-steps (.1);	0.80	\$500.00
2/21/2023	Timothy Burns	Attend court status hearing re competing Plans (.7); participate in post-hearing conference with J. Bair re outcome of same and potential next-steps (.1);	0.80	\$780.00
2/21/2023	Jesse Bair	Review Diocese letter re IRCP document production (.1);	0.10	\$62.50
2/21/2023	Jesse Bair	Review the Diocese's sixth omnibus claims objection (.2); review Renker declaration in support of same (.1);	0.30	\$187.50
2/21/2023	Jesse Bair	Review final version of Committee preliminary injunction deposition notices served on the Diocese (.1);	0.10	\$62.50
2/22/2023	Jesse Bair	Review most recent version of the Committee's work-in-progress litigation task list (.1);	0.10	\$62.50
2/22/2023	Jesse Bair	Review the Diocese's seventh omnibus claims objection (.1);	0.10	\$62.50

2/22/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re call to discuss potential judicial mediator (.1); review information re the Diocese's suggested candidate for judicial mediator (.1);	0.20	\$125.00
2/22/2023	Jesse Bair	Review and edit initial draft of the Committee's first omnibus objection to affiliate claims (.6); review J. Elkins edits to same (.1); review J. Stang edits to same (.1); review additional correspondence with PSZJ re potential edits to same (.1);	0.90	\$562.50
2/23/2023	Jesse Bair	Review correspondence with the Debtor and PSZJ re potential judicial mediators (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Begin reviewing survivor response to the Diocese's fourth omnibus claims objection (.3);	0.30	\$187.50
2/23/2023	Jesse Bair	Review correspondence with G. Greenwood and K. Brown re DOE settlement status (.1);	0.10	\$62.50
2/23/2023	Timothy Burns	Brief review re the Diocese's sixth omnibus claims objection (.1); brief review re the Diocese's seventh omnibus claims objection (.1);	0.20	\$195.00
2/23/2023	Jesse Bair	Participate in conference with PSZJ re work in progress issues and mediation strategy (1.8);	1.80	\$1,125.00
2/23/2023	Jesse Bair	Brief review re recent Diocese preliminary injunction document production (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Review Order reinstating the Committee as a party to the Evanston district court action and correspond with PSZJ re same (.1);	0.10	\$62.50
2/23/2023	Jesse Bair	Prepare for state court counsel meeting re judicial mediator issues (.1); participate in state court counsel meeting re same (.6);	0.70	\$437.50
2/23/2023	Timothy Burns	Review the Committee's draft affiliate claims objection motion (.4);	0.40	\$390.00
2/23/2023	Timothy Burns	Review email from B. Michael re mediator selection issues (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review Committee reinstatement order in Evanston district court action (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Analyze proposed preliminary injunction insurance exhibits (.4); correspondence with G. Greenwood re potential edits to same (.2); review revised versions of preliminary injunction insurance exhibits (.3); additional correspondence with G. Greenwood re same (.1); review draft correspondence from G. Greenwood to the Diocese re same (.1);	1.10	\$687.50
2/24/2023	Jesse Bair	Review correspondence with state court counsel and K. Dine re judicial mediator issues (.2);	0.20	\$125.00
2/24/2023	Timothy Burns	Email to J. Bair re insurance analysis assignment (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Participate in conference with T. Burns re judicial mediator selection issues (.1);	0.10	\$62.50
2/24/2023	Timothy Burns	Review correspondence from G. Greenwood re preliminary injunction exhibits (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review correspondence from PSZJ re mediator selection (.1);	0.10	\$97.50

2/24/2023	Timothy Burns	Prepare for state court counsel meeting (.1); Participate in state court counsel meeting re mediation issues (.6); participate in post-call with PSZJ and J. Bair re outcome of state court counsel meeting and next-steps (.1);	0.80	\$780.00
2/24/2023	Jesse Bair	Participate in state court counsel meeting re mediation issues (.6); participate in post-call with PSZJ and T. Burns re outcome of state court counsel meeting and next-steps (.1);	0.70	\$437.50
2/24/2023	Timothy Burns	Initial review of Merson plaintiffs' opposition to Diocese's fourth omnibus claim objection (.8);	0.80	\$780.00
2/24/2023	Timothy Burns	Review pro hac vice submission in Evanston district court action (.1);	0.10	\$97.50
2/24/2023	Karen Dempski	Finalize and file pro hac vice submission for T. Burns in Evanston district court action (.2);	0.20	\$72.00
2/24/2023	Timothy Burns	Review correspondence from state court counsel re mediator selection issues (.2);	0.20	\$195.00
2/24/2023	Timothy Burns	Additional analysis re mediator selection issue (.1);	0.10	\$97.50
2/24/2023	Timothy Burns	Review correspondence from K. Brown re DOE negotiation status (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Continue reviewing survivor response to the Diocese's fourth omnibus claims objection and related exhibits (.3); correspondence with T. Burns re associate research project re potential insurance impact, if any, of claim objection issues (.1); provide instructions to B. Cawley re same (.2);	0.60	\$375.00
2/24/2023	Timothy Burns	Review correspondence from G. Greenwood re DOE negotiations (.1);	0.10	\$97.50
2/24/2023	Jesse Bair	Review correspondence with state court counsel re potential judicial mediator (.1);	0.10	\$62.50
2/24/2023	Brian Cawley	Conference with J. Bair re potential insurance impact, if any, of claim objection issues (.2); conduct supplemental research on New York expected/intended and late notice law (.6);	0.80	\$336.00
2/25/2023	Timothy Burns	Review correspondence from G. Greenwood to Jones Day re preliminary injunction hearing exhibits (.1);	0.10	\$97.50
2/25/2023	Jesse Bair	Review PSZJ memo re case next-steps re Plan and Disclosure Statement process (.1);	0.10	\$62.50
2/25/2023	Leakhena Au	Analysis re insurance assignment issues (.2);	0.20	\$84.00
2/25/2023	Jesse Bair	Review PSZJ memo re status of FCC and cell tower sales (.1);	0.10	\$62.50
2/25/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re preliminary injunction issues and next-steps with case litigation (.1);	0.10	\$62.50
2/25/2023	Jesse Bair	Review PSZJ letter to the Diocese re cell tower bid issues (.1);	0.10	\$62.50
2/25/2023	Timothy Burns	Review draft stipulation re preliminary injunction evidence (.1); review related correspondence with G. Greenwood re same (.1);	0.20	\$195.00



2/26/2023	Timothy Burns	Review and suggest revisions to draft opposition to PI Motion, along with review of case law related to jurisdictional and merits aspects of motion (4.1);	4.10	\$3,997.50
2/26/2023	Jesse Bair	Review T. Burns correspondence re potential insurance addition to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
2/26/2023	Jesse Bair	Review additional correspondence with PSZJ and state court counsel re preliminary injunction issues and next-steps with case litigation (.1);	0.10	\$62.50
2/27/2023	Jesse Bair	Review information regarding the Diocese's most recent suggestion for a judicial mediator (.1); review correspondence with PSZJ and state court counsel re same (.1);	0.20	\$125.00
2/27/2023	Timothy Burns	Further review of case law regarding preliminary injunction issues, including jurisdiction and automatic stay issues (3.2); review of cases and analysis re SIR issues, if any, for Committee plan analysis purposes (.9); review of case law re cooperation duties re Plan issues (1.6); analyze case law re good faith requirement and TDPs re Committee plan issues (2.2);	7.90	\$7,702.50
2/27/2023	Jesse Bair	Review draft outline for deposition of C. Moore (.4); review correspondence with J. Stang and state court counsel re same (.1);	0.50	\$312.50
2/27/2023	Brian Cawley	Continue analyzing late notice and expected/intended issues under N.Y. law (1.3); analyze claim objection briefing in connection with impact, if any, on insurer coverage defenses (1.5);	2.80	\$1,176.00
2/27/2023	Jesse Bair	Correspondence with B. Michael re additional insured questions (.1);	0.10	\$62.50
2/27/2023	Jesse Bair	Review draft stipulation regarding the admissibility of certain proposed preliminary injunction exhibits (.1); related analysis re additional potential insurance policy exhibits (.1);	0.20	\$125.00
2/27/2023	Jesse Bair	Review revised draft of the Committee's first omnibus objection to parish POCs (.3);	0.30	\$187.50
2/28/2023	Jesse Bair	Participate in conference with T. Burns re preparations and strategy re upcoming Porter deposition (.1);	0.10	\$62.50
2/28/2023	Jesse Bair	Participate in conference with I. Nasatir re insurance Plan issues (.2);	0.20	\$125.00
2/28/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re judicial mediator issues (.1);	0.10	\$62.50
2/28/2023	Jesse Bair	Participate in additional conference with I. Nasatir re insurance mediation issues (.2);	0.20	\$125.00
2/28/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re case update (.1);	0.10	\$62.50

2/28/2023	Timothy Burns	Further review of cases re good faith requirement and TDPs re UCC plan issues (3.7); review correspondence between PSZJ and state court counsel re potential judicial mediators and bio materials (.2); review PSZJ update correspondence to the Committee and state court counsel re ongoing case developments (.1);	4.00	\$3,900.00
2/28/2023	Jesse Bair	Participate in conference with PSZJ and state court counsel re judicial mediator selection, preliminary injunction briefing, and other ongoing litigation issues (.8); participate in post-call with PSZJ re outcome of meeting and next-steps (.1);	0.90	\$562.50
2/28/2023	Brian Cawley	Continue analyzing claim objection briefing in connection with impact, if any, on insurer coverage defenses (.5 ); draft email memorandum summarizing claim objection analysis results (1.2);	1.70	\$714.00
2/28/2023	Jesse Bair	Review LMI and the Diocese's joint status letter to Judge Cronan (.1);	0.10	\$62.50
<b>Total Hours and Fees</b>			<b>106.50</b>	<b>\$66,481.50</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
2/9/2023	Wisconsin Certificate of Good Standing, J. Bair	\$3.05
2/9/2023	Illinois Certificate of Good Standing, T. Burns	\$16.00
2/9/2023	Missouri Certificate of Good Standing, T. Burns	\$16.25
2/16/2023	Pro Hac Vice admission, J. Bair	\$200.00
2/24/2023	Pro Hac Vice admission, T. Burns	\$200.00
<b>Total Expenses</b>		<b>\$435.30</b>

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.10	\$360.00	\$36.00
Brenda Horn	3.10	\$360.00	\$1,116.00
Brian Cawley	5.40	\$420.00	\$2,268.00
Jesse Bair	33.90	\$625.00	\$21,187.50
Karen Dempksi	1.70	\$360.00	\$612.00
Leakhena Au	17.30	\$420.00	\$7,266.00
Nathan Kuenzi	17.80	\$420.00	\$7,476.00
Timothy Burns	27.20	\$975.00	\$26,520.00

**Total Due This Invoice: \$66,916.80**



10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of The  
Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 4/4/2023

**Bill # :** 01099

**Matter:** Insurance

**PROFESSIONAL SERVICES RENDERED**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
3/1/2023	Jesse Bair	Review G. Greenwood correspondence with Diocese re proposed insurance preliminary injunction exhibits (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Review recent New York state court decision re notice under the CVA (.2); review correspondence with PSZJ re same (.1);	0.30	\$187.50
3/1/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re judicial mediator selection (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Listen to and respond to voice-message from Reed Smith re LMI district court action (.1);	0.10	\$62.50
3/1/2023	Jesse Bair	Review the Diocese's eighth omnibus claims objection (.4);	0.40	\$250.00
3/1/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re potential mediation session (.2); review the Diocese's eighth omnibus claims objection (.4); review various correspondence between PSZJ and state court counsel re judicial mediator selection (.3); review and consider PSZJ memo re next steps re plan and disclosure statement (.2);	1.10	\$1,072.50
3/2/2023	Jesse Bair	Review current version of Committee work-in-progress litigation list (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Participate in conference with PSZJ team re mediation and litigation strategy (1.3);	1.30	\$812.50
3/2/2023	Jesse Bair	Analysis re third-party release issue re Diocese Plan (.3);	0.30	\$187.50
3/2/2023	Jesse Bair	Begin reviewing draft of second amended Committee Plan (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review Herman law firm response to the Diocese's fourth omnibus claims objection (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re updates re judicial mediator selection (.1);	0.10	\$62.50

3/2/2023	Jesse Bair	Review draft letter to the Diocese re judicial mediator selection (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Review suggested edits from state court counsel to current draft of the Committee's objection to the Diocese's preliminary injunction motion (.1);	0.10	\$62.50
3/2/2023	Jesse Bair	Review Marsh law firm response to the Diocese's fourth omnibus claims objection (.2);	0.20	\$125.00
3/2/2023	Jesse Bair	Review correspondence from the Diocese re proposed preliminary injunction insurance exhibits (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Participate in state court counsel meeting re mediation strategy (.9);	0.90	\$562.50
3/3/2023	Jesse Bair	Review draft Committee joint letter to the Court re estimation and judicial mediator selection (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review B. Cawley's email memorandum re potential insurance impacts, if any, of certain claim objections (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review deposition outline for E. Stephens (.5); review correspondence with J. Stang and state court counsel re same (.1);	0.60	\$375.00
3/3/2023	Jesse Bair	Review LMI and Interstate's letter to the Court re estimation and judicial mediator issue (.1);	0.10	\$62.50
3/3/2023	Timothy Burns	Participate in state court counsel meeting re mediator selection, preliminary injunction, and ongoing case issues (.9); participate in call with J. Bair and I. Nasatir re preparations and strategy for upcoming Porter deposition(.1);	1.00	\$975.00
3/3/2023	Jesse Bair	Review the Diocese's letter to the Committee re judicial mediator issues (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Participate in conference with I. Nasatir and T. Burns re preparations and strategy for upcoming Porter deposition (.1);	0.10	\$62.50
3/3/2023	Jesse Bair	Review the Debtor's reply in support of its 4th omnibus claims objection (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Correspondence with G. Greenwood re potential additional insurance-related preliminary injunction exhibits and the Diocese's proposed edits to the existing insurance schedules (.2);	0.20	\$125.00
3/4/2023	Jesse Bair	Analysis regarding the Diocese's suggested edits to the Committee's proposed preliminary injunction insurance exhibits (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Analysis regarding potential insurance edit to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/4/2023	Jesse Bair	Analysis re potential additional insurance-related preliminary injunction exhibits proposed by the Diocese (.3);	0.30	\$187.50
3/4/2023	Jesse Bair	Review and edit BB's seventh interim fee application (.9);	0.90	\$562.50

3/4/2023	Timothy Burns	Review correspondence with the Diocese and PSZJ re preliminary injunction hearing exhibits (.1); review the parties' letters to the court re judicial mediator issue (.1);	0.20	\$195.00
3/4/2023	Jesse Bair	Analysis regarding Porter deposition strategy (.1);	0.10	\$62.50
3/4/2023	Jesse Bair	Review correspondence with the Diocese and G. Greenwood re proposed insurance preliminary injunction exhibits and suggested edits to same (.2);	0.20	\$125.00
3/5/2023	Jesse Bair	Correspondence with B. Horn re edits needed to BB's seventh interim fee application (.1);	0.10	\$62.50
3/5/2023	Jesse Bair	Review initial Claro insurance questions in preparation for upcoming call (.2); correspondence with A. Kornfeld re same (.1);	0.30	\$187.50
3/5/2023	Timothy Burns	Review correspondence with the Diocese and PSZJ re preliminary injunction hearing exhibits (.2); review J. Cronan's order re discovery dispute (.1);	0.30	\$292.50
3/6/2023	Jesse Bair	Review and respond to additional insurance question received from Claro (.2);	0.20	\$125.00
3/6/2023	Jesse Bair	Review initial draft of proposed K. Porter deposition outline (.8);	0.80	\$500.00
3/6/2023	Jesse Bair	Analyze the Arrowood policies re retroactive premium adjustment (.3); analyze case law re enforceability, if any, of retroactive premium adjustment in bankruptcy (.4);	0.70	\$437.50
3/6/2023	Jesse Bair	Begin drafting revised version of the Porter deposition outline, including review of prior Porter declarations (.5);	0.50	\$312.50
3/6/2023	Jesse Bair	Participate in portion of Committee meeting re ongoing case issues (.6);	0.60	\$375.00
3/6/2023	Jesse Bair	Review the Diocese's letter to the Court re the Committee's claim objection adjournment request (.1);	0.10	\$62.50
3/6/2023	Jesse Bair	Prepare for call with Claro re insurance allocation analysis (.1); participate in call with Claro and PSZJ re insurance allocation analysis and outstanding questions re same (1.0);	1.10	\$687.50
3/6/2023	Jesse Bair	Participate in call with Reed Smith re case insurance issues (.2);	0.20	\$125.00
3/6/2023	Timothy Burns	Review and revise initial draft of Porter deposition outline (.7); correspondence with J. Bair re same (.1); begin review of Moore deposition transcript (.9);	1.70	\$1,657.50
3/6/2023	Jesse Bair	Analyze and respond to Claro questions re applicable policy limits (.3);	0.30	\$187.50
3/7/2023	Jesse Bair	Participate in call with G. Greenwood re the preliminary injunction insurance schedules and potential exhibits for the Porter deposition (.3);	0.30	\$187.50
3/7/2023	Jesse Bair	Prepare for Porter deposition, including drafting revised Porter depo outline and analyzing related case materials, including Diocesan PI discovery responses, earlier Porter declarations, and associated case briefing (3.2);	3.20	\$2,000.00

3/7/2023	Jesse Bair	Review revised preliminary injunction insurance schedules received from the Diocese (.2); participate in call with the Diocese, G. Greenwood, and I. Nasatir re same and potential additional revisions (.3); participate in follow-up call with I. Nasatir re same (.1);	0.60	\$375.00
3/7/2023	Jesse Bair	Review and respond to correspondence with PSZJ team re strategy and preparations for upcoming Porter depositions (.2);	0.20	\$125.00
3/8/2023	Jesse Bair	Review K. Dine email memorandum re mediation session outcome and related follow-up items (.1);	0.10	\$62.50
3/8/2023	Timothy Burns	Participate in conference with J. Bair re mediation session outcome and potential next-steps (.2); supplemental analysis re going-forward insurance strategy (.1);	0.30	\$292.50
3/8/2023	Jesse Bair	Review correspondence from K. Dine re upcoming status conference with the Court re mediation and claim objection process (.1);	0.10	\$62.50
3/8/2023	Jesse Bair	Review correspondence from E. Stephens re further revised preliminary injunction insurance schedules from the Diocese (.1); review proposed insurance schedules (.1); draft correspondence to PSZJ and T. Burns re additional edits needed to same (.1);	0.30	\$187.50
3/8/2023	Jesse Bair	Draft correspondence to the Diocese re potential additional edits to the revised preliminary injunction insurance schedules (.2); additional correspondence with G. Greenwood re finalizing insurance schedules (.1);	0.30	\$187.50
3/8/2023	Jesse Bair	Continue preparing for Porter deposition, including drafting revised Porter depo outline, analyzing related case materials, and identifying potential exhibits for deposition (5.0);	5.00	\$3,125.00
3/8/2023	Jesse Bair	Participate in call with I. Nasatir re mediation session outcome and upcoming Porter deposition (.3);	0.30	\$187.50
3/8/2023	Jesse Bair	Review and respond to correspondence with G. Greenwood re Porter deposition exhibits (.3);	0.30	\$187.50
3/8/2023	Jesse Bair	Participate in conference with T. Burns re mediation session outcome and potential next-steps (.2);	0.20	\$125.00
3/8/2023	Jesse Bair	Review correspondence from B. Michael re potential motion to dismiss and associated research results (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Review correspondence from B. Michael re upcoming claim objection hearing (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Participate in conference with T. Burns re outcome of court status conference and Porter deposition (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Participate in conference with T. Burns re status of the insurance adversary proceedings and judicial mediator issue (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Participate in conference with T. Burns re recent call with Reed Smith re case insurance issues (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Review the Diocese's supplemental preliminary injunction discovery responses and document production (.4);	0.40	\$250.00

3/9/2023	Jesse Bair	Continue preparing for Porter deposition (.4);	0.40	\$250.00
3/9/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re finalizing the preliminary injunction insurance schedules (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re mediation strategy, potential motion to dismiss, and other ongoing case issues (1.6);	1.60	\$1,000.00
3/9/2023	Jesse Bair	Participate in call with I. Nasatir re outcome of Porter deposition (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Conduct deposition of K. Porter (2.8);	2.80	\$1,750.00
3/9/2023	Timothy Burns	Correspondence with B. Michael and J. Bair re court conference re judicial mediator (.2); review correspondence with the Diocese and PSZJ re supplemental discovery materials from Diocese (.2); review and analysis of email from K. Dine re mediation summary (.2); review correspondence from B. Michael re Diocese's SOL argument (.1); review Diocese monthly PSIP information report (.1); conference with J. Bair re preparations for judicial mediator conference with J. Glenn (.2); conference with J. Bair re recent call with Reed Smith (.1); prepare for conference with court re judicial mediator, including review of emails re same (.2); meet with team re hearing logistics (.1); review of Diocese's supplemental discovery responses, including review of attached exhibits (Ecclesia policy and Arrowood financial reporting information) (.8); attend virtual chambers conference for insurance purposes (.6); emails and call from state court counsel re case and resolution strategy (.3); review correspondence from PSZJ re upcoming claims objections hearing (.1); conference with J. Bair re Porter deposition and Chambers conference outcome (.2); participate in portion of meeting with PSZJ and J. Bair re next steps re bankruptcy for insurance purposes (1.5);	4.90	\$4,777.50
3/10/2023	Jesse Bair	Correspondence with B. Michael re BB's seventh interim fee application (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review correspondence with the Diocese re finalizing the preliminary injunction insurance exhibits (.1); review proposed final versions of the exhibits (.1);	0.20	\$125.00
3/10/2023	Jesse Bair	Review correspondence from Arrowood re Arrowood's request to attend preliminary injunction depositions (.1);	0.10	\$62.50
3/10/2023	Jesse Bair	Review draft stipulation and order re the admissibility of preliminary injunction exhibits (.1);	0.10	\$62.50
3/11/2023	Jesse Bair	Review correspondence with K. Brown re potential edits to the preliminary injunction opposition brief (.1);	0.10	\$62.50
3/11/2023	Timothy Burns	Review Agenda for March 14 Hearing (.1); review stipulation and order regarding admissibility of preliminary injunction exhibits (.1); review Arrowood correspondence re deposition attendance request (.1);	0.30	\$292.50

3/13/2023	Jesse Bair	Review the Debtor's reply in support of its fifth omnibus claims objection (.3);	0.30	\$187.50
3/13/2023	Jesse Bair	Review debtor reply brief in support of cell tower sale (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Correspondence with I. Nasatir and K. Brown re error in the Porter dispositions transcript (.1); correspondence with the Debtor re correcting same (.1);	0.20	\$125.00
3/13/2023	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/13/2023	Jesse Bair	Review correspondence from B. Michael re upcoming Committee meeting (.1);	0.10	\$62.50
3/13/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/13/2023	Alyssa Turgeon	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$36.00
3/13/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re ongoing case issues (.8); participate in BB team meeting re case status and ongoing projects (.1);	0.90	\$877.50
3/13/2023	Jesse Bair	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Review additional correspondence with G. Greenwood, K. Dine, and B, Michael re finalization of preliminary injunction opposition brief (.1);	0.10	\$62.50
3/13/2023	Jesse Bair	Review suggested insurance edit to the Committee's preliminary injunction opposition brief received from I. Nasatir (.1); review and respond to correspondence with G. Greenwood and I. Nasatir re same and final additional insurance edits to the Committee's preliminary injunction opposition brief (.3);	0.40	\$250.00
3/13/2023	Jesse Bair	Review and edit most recent draft of the Committee's preliminary injunction opposition brief, including incorporating excerpts from the recent Porter deposition (1.2);	1.20	\$750.00
3/13/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing case issues (.8);	0.80	\$500.00
3/14/2023	Jesse Bair	Correspondence with G. Greenwood re supplemental insurance edit to the Committee preliminary injunction opposition brief (.1);	0.10	\$62.50
3/14/2023	Timothy Burns	Review agenda for March 14 hearing (.1); attend court hearing on claim objections, cell tower sale, and status conference to assess insurance-related settlement issues (2.7);	2.80	\$2,730.00
3/14/2023	Jesse Bair	Review correspondence with J. Stang, K. Dine, and state court counsel re status conference outcome and potential next-steps (.2);	0.20	\$125.00
3/14/2023	Jesse Bair	Review and edit Porter deposition exhibit to the Committee preliminary injunction opposition brief (.3);	0.30	\$187.50



3/14/2023	Jesse Bair	Attend court hearing on claim objections, cell tower sale, and status conference to assess insurance-related settlement issues (.2.7);	2.70	\$1,687.50
3/14/2023	Jesse Bair	Review additional correspondence with G. Greenwood and I. Nasatir re final insurance edits to the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/15/2023	Timothy Burns	Review correspondence with state court counsel, PSZJ, and the Committee re status conference outcome and potential next-steps (.2);	0.20	\$195.00
3/16/2023	Jesse Bair	Review revised version of preliminary injunction evidentiary stipulation received from the Diocese (.1); correspondence with K. Brown, G. Greenwood, and I. Nasatir re same (.1); review additional correspondence with the Diocese re same (.1);	0.30	\$187.50
3/16/2023	Jesse Bair	Participate in call with J. Stang re status of the insurance district court actions and overall insurance strategy (.3);	0.30	\$187.50
3/16/2023	Jesse Bair	Review and respond to correspondence with J. Stang re Evanston district court status update letter (.2);	0.20	\$125.00
3/16/2023	Jesse Bair	Draft proposed language for Evanston district court status update letter re the current status of the case and mediation negotiations (.3);	0.30	\$187.50
3/16/2023	Jesse Bair	Review insurer exposure analysis (.1); assess potential next-steps in connection with insurance negotiations (.1);	0.20	\$125.00
3/16/2023	Jesse Bair	Review draft status update letter circulated by the Diocese (.1); correspond with the Diocese re suggested edits to same (.1); review revised version of the status update letter for the Evanston district court action (.1); review correspondence with Evanston re same (.1);	0.40	\$250.00
3/16/2023	Jesse Bair	Review and respond to correspondence with the Diocese re joint status letter due in the Evanston district court action (.2);	0.20	\$125.00
3/17/2023	Jesse Bair	Review correspondence with PSZJ and state court counsel re final version of preliminary injunction opposition brief and next-steps (.1);	0.10	\$62.50
3/17/2023	Jesse Bair	Review Evanston's suggested edits to the draft joint status update letter (.1);	0.10	\$62.50
3/17/2023	Jesse Bair	Review correspondence from B. Michael to state court counsel re case update (.1);	0.10	\$62.50
3/17/2023	Timothy Burns	Review joint status update letter to court in Evanston adversary proceeding (.1);	0.10	\$97.50
3/17/2023	Jesse Bair	Review draft joinder in support of the Committee's preliminary injunction opposition brief (.1);	0.10	\$62.50
3/18/2023	Jesse Bair	Review correspondence with K. Dine and the Committee re preliminary injunction briefing issues (.1);	0.10	\$62.50
3/21/2023	Jesse Bair	Correspondence with E. Stephens re edit to the Porter deposition transcript (.1);	0.10	\$62.50

3/21/2023	Brenda Horn	Draft BB's twenty-eighth monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
3/21/2023	Jesse Bair	Provide instructions to B. Cawley re supplemental research needed re the insurers' purported late notice defense (.1); review B. Cawley email memorandum summarizing supplemental research results (.1);	0.20	\$125.00
3/21/2023	Jesse Bair	Review correspondence with B. Michael re Committee motion to dismiss (.1);	0.10	\$62.50
3/21/2023	Timothy Burns	Participate in conference with J. Bair re case insurance strategy (.3);	0.30	\$292.50
3/21/2023	Brian Cawley	Analysis re the ability of an injured party to provide notice instead of a policyholder under New York Insurance Law Section 3420 (1.8); draft summary of Section 3420 research (.2);	2.00	\$840.00
3/21/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.3);	0.30	\$187.50
3/22/2023	Jesse Bair	Review the Parishes' response to the Committee's claim objections (.3); review related appendix re PSIP issues (.1);	0.40	\$250.00
3/22/2023	Timothy Burns	Analysis and consideration of claimant notice issue under New York Insurance Law Section 3420 (.3); conference with J. Bair re same (.1); correspond with J. Bair re same (.1);	0.50	\$487.50
3/22/2023	Jesse Bair	Review and respond to questions from state court counsel re additional insured issues (.2);	0.20	\$125.00
3/22/2023	Jesse Bair	Respond to T. Burns correspondence re the insurers' purported late notice defense and supplemental research needed in connection with same (.1); participate in conference with T. Burns re same (.1);	0.20	\$125.00
3/22/2023	Jesse Bair	Review the Diocese's reply in support of its sixth omnibus claims objection (.4);	0.40	\$250.00
3/23/2023	Jesse Bair	Analyze LMI's answer and affirmative defenses in the LMI district court action (.4);	0.40	\$250.00
3/23/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing projects (.1);	0.10	\$42.00
3/23/2023	Jesse Bair	Participate in call with J. Stang re the Committee's motion to dismiss, case status, and related insurance issues (.3);	0.30	\$187.50
3/23/2023	Jesse Bair	Analyze and respond to questions from state court counsel re historical Diocesan insurance issues (.3);	0.30	\$187.50
3/23/2023	Jesse Bair	Review recent appellate decision re Diocesan liability for CVA claims (.1);	0.10	\$62.50
3/23/2023	Jesse Bair	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$62.50
3/23/2023	Brian Cawley	Additional research re claimant notice requirements under New York Insurance Law Section 3420 (.3); draft summary of research findings (.1);	0.40	\$168.00
3/23/2023	Timothy Burns	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$97.50

3/23/2023	Jesse Bair	Review correspondence with I. Nasatir and BRG re PSIP issues (.1);	0.10	\$62.50
3/23/2023	Brian Cawley	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$42.00
3/23/2023	Jesse Bair	Provide instructions to L. Au re additional insured analysis needed in connection with the Committee's motion to dismiss (.1);	0.10	\$62.50
3/23/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$36.00
3/23/2023	Jesse Bair	Begin reviewing and editing the Committee's motion to dismiss (.5);	0.50	\$312.50
3/23/2023	Jesse Bair	Review correspondence with K. Dine, I. Nasatir. and K. Brown re potential edits to the draft motion to dismiss (.1);	0.10	\$62.50
3/23/2023	Jesse Bair	Analyze Lexington's answer and affirmative defenses in the LMI district court action (.2);	0.20	\$125.00
3/23/2023	Nathan Kuenzi	Participate in BB team meeting re case developments and associated projects (.1);	0.10	\$42.00
3/24/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re potential judicial mediator candidate (.1);	0.10	\$62.50
3/24/2023	Timothy Burns	Review the Committee's draft motion to dismiss (.9); participate in state court counsel meeting re ongoing case issues and strategy (.7); review email from B. Michael re potential judicial mediator (.1); review agenda for March 28 court hearing (.1); review recent 1st Dept appellate decision re Diocesan liability for CVA claims (.1); review Marsh plaintiffs Joinder to Objection to Injunction Motion (.1); review and consider B. Cawley research results re notice issues under New York Insurance Law Section 3420 (.2); review correspondence with PSZJ and state court counsel re motion to dismiss (.1); review correspondence with PSZJ and BRG re PSIP issues (.1); review K. Dine's suggested edits to the draft motion to dismiss (.1);	2.50	\$2,437.50
3/24/2023	Leakhena Au	Conduct supplemental additional insured analysis needed in connection with motion to dismiss briefing (3.4);	3.40	\$1,428.00
3/24/2023	Jesse Bair	Review survivor response to the Diocese's 9th omnibus claims objection (.2);	0.20	\$125.00
3/24/2023	Jesse Bair	Analyze L. Au research results re supplemental additional insured analysis completed in connection with motion to dismiss briefing (.2); review Diocese Plan terms and exhibits in relation to same (.2);	0.40	\$250.00
3/24/2023	Jesse Bair	Edit and revise the Committee's motion to dismiss brief with focus on insurance-related edits (1.2);	1.20	\$750.00
3/24/2023	Jesse Bair	Participate in state court counsel meeting re ongoing case issues and strategy (.7);	0.70	\$437.50
3/24/2023	Jesse Bair	Review second survivor response to the Diocese's 9th omnibus claims objection (.2);	0.20	\$125.00

3/24/2023	Jesse Bair	Correspondence with G. Greenwood re preliminary injunction hearing preparations (.1);	0.10	\$62.50
3/24/2023	Jesse Bair	Review and respond to correspondence with L. Au re supplemental additional insured analysis needed in connection with motion to dismiss briefing (.2);	0.20	\$125.00
3/25/2023	Jesse Bair	Review letter from the Committee to the Diocese re recent appellate decision impacting the Diocese's claims objections (.1);	0.10	\$62.50
3/25/2023	Jesse Bair	Review correspondence from K. Brown and G. Greenwood re preliminary injunction hearing evidence (.1);	0.10	\$62.50
3/26/2023	Jesse Bair	Analysis re insurance-related evidence for use during the preliminary injunction hearing (.1); correspondence with K, Brown and G. Greenwood re same (.1);	0.20	\$125.00
3/26/2023	Jesse Bair	Review correspondence from state court counsel re recent appellate decision impacting the Diocese's claim objections (.1);	0.10	\$62.50
3/26/2023	Timothy Burns	Participate in calls with state court counsel re insurance issues and strategy (.5);	0.50	\$487.50
3/27/2023	Jesse Bair	Review final version of the Committee's motion to dismiss (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Review correspondence from the Diocese re its refusal to withdraw its 6th omnibus claims objection in light of recent appellate decision (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Review the Committee's motion to stay (.2);	0.20	\$125.00
3/27/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction exhibits and evidence (.1);	0.10	\$62.50
3/27/2023	Jesse Bair	Participate in conference with T. Burns re potential claims against the Diocese's insurers and related Arrowood issues (.2);	0.20	\$125.00
3/27/2023	Jesse Bair	Review the parties' joint correspondence to the Court re potential judicial mediator (.1);	0.10	\$62.50
3/27/2023	Timothy Burns	Participate in conference with J. Bair re potential claims against the Diocese's insurers and related Arrowood issues (.2); participate in call with state court counsel re same (.3);	0.50	\$487.50
3/27/2023	Jesse Bair	Review correspondence with J. Stang, B. Michael, and state court counsel re next-steps re the Committee's motion to dismiss (.1);	0.10	\$62.50
3/28/2023	Jesse Bair	Review agenda for Committee meeting (.1); participate in Committee meeting re ongoing case issues for insurance purposes (1.4);	1.50	\$937.50
3/28/2023	Jesse Bair	Review Porter errata sheet (.1);	0.10	\$62.50
3/28/2023	Jesse Bair	Participate in meeting with PSZJ and state court counsel re motion to dismiss and going-forward case strategy (1.0); participate in post-call meeting with PSZJ team and T. Burns re same (.7);	1.70	\$1,062.50
3/28/2023	Timothy Burns	Conference with J. Bair re ongoing developments and strategy on insurance (.2);	0.20	\$195.00

3/28/2023	Jesse Bair	Attend hearing on claims objections for insurance purposes (1.6);	1.60	\$1,000.00
3/28/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re motion to dismiss issues (.1);	0.10	\$62.50
3/28/2023	Brian Cawley	Begin analyzing recent BSA district court opinion re issues implicating DRVC action (1.5);	1.50	\$630.00
3/28/2023	Jesse Bair	Conference with T. Burns re ongoing developments and strategy on insurance (.2);	0.20	\$125.00
3/28/2023	Jesse Bair	Provide instructions to B. Cawley re analysis needed in connection with recent BSA decision re ongoing issues in DRVC case (.1);	0.10	\$62.50
3/28/2023	Timothy Burns	Attend hearing on claims objections for insurance purposes (1.6); participate in meeting with PSZJ and state court counsel re motion to dismiss and going-forward case strategy (1.0); participate in post-call meeting with PSZJ team and J. Bair re same (.7); review correspondence from state court counsel re joinders in motion to dismiss (.1); participate in Committee meeting re ongoing case issues for insurance purposes (1.4);	4.80	\$4,680.00
3/28/2023	Jesse Bair	Analysis re potential motion to dismiss insurance-related discovery (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Review draft preliminary injunction exhibit list and and consider potential additions to same (.2); correspondence with G. Greenwood and K. Brown re same (.1);	0.30	\$187.50
3/29/2023	Jesse Bair	Review the Diocese's reply in support of its eighth omnibus claims objection (.4);	0.40	\$250.00
3/29/2023	Jesse Bair	Review notice of hearing re seventh interim fee applications (.1);	0.10	\$62.50
3/29/2023	Brian Cawley	Continue analyzing detailed BSA district court opinion re issues implicating DRVC action (4.6);	4.60	\$1,932.00
3/29/2023	Jesse Bair	Review the Committee's reply in support of its parish and affiliate claim objections (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Additional analysis re insurance-related motion to dismiss issues (.1);	0.10	\$62.50
3/29/2023	Jesse Bair	Review correspondence with J. Stang, state court counsel, and the Committee re motion to stay issues (.2);	0.20	\$125.00
3/29/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re ongoing case issues and next-steps (.6);	0.60	\$375.00
3/30/2023	Jesse Bair	Participate in call with T. Burns re insurance issues in connection with potential upcoming mediation (.2);	0.20	\$125.00
3/30/2023	Brian Cawley	Continue analyzing detailed BSA district court opinion re issues implicating DRVC action (2.8);	2.80	\$1,176.00

3/30/2023	Jesse Bair	Review Judge Glenn's pre-trial conference order template (.1); review correspondence with G. Greenwood and K. Brown re preparing same (.1); review correspondence with G. Greenwood and the Diocese re same (.1);	0.30	\$187.50
3/30/2023	Jesse Bair	Review the Court's Order sustaining the Diocese's 4th omnibus claims objection (.5);	0.50	\$312.50
3/30/2023	Jesse Bair	Review analysis of insurance exposures in connection with potential upcoming mediation session (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Answer B. Cawley questions re project re analysis of recent BSA decision in connection with insurance issues relevant to the DRVC case (.2);	0.20	\$125.00
3/30/2023	Jesse Bair	Review the parties' joint letter to the Court requesting stay of proceedings (.1);	0.10	\$62.50
3/30/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction exhibit list issues (.1);	0.10	\$62.50
3/30/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re court rulings and mediation (.2); participate in call with J. Bair re insurance issues in connection with potential upcoming mediation (.2); participate in portion of meeting with PSZJ and J. Bair re ongoing case issues and next-steps (.3);	0.70	\$682.50
3/30/2023	Jesse Bair	Review various correspondence with J. Stang, state court counsel, and the Committee re denial of the motion to stay, potential judicial mediator, and case next-steps (.2);	0.20	\$125.00
3/30/2023	Brian Cawley	Begin outlining memorandum re recent BSA decision in connection with insurance issues relevant to DRVC case (2.9); participate in conference with J. Bair re questions regarding same (.2);	3.10	\$1,302.00
3/31/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re upcoming Chambers conference re mediation issues (.2);	0.20	\$195.00
3/31/2023	Jesse Bair	Review the Parishes' response to the Committee's preliminary injunction opposition (.1); analyze insurance issues in connection with same (.1);	0.20	\$125.00
3/31/2023	Jesse Bair	Review the Diocese's reply in support of its 9th omnibus claims objection (.4);	0.40	\$250.00
3/31/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (3.6);	3.60	\$1,512.00
3/31/2023	Jesse Bair	Review the Diocese's and LMI's joint status update letter to Judge Cronan (.1);	0.10	\$62.50
3/31/2023	Jesse Bair	Review state court counsel joinders in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
3/31/2023	Jesse Bair	Review K. Dine email memorandum re outcome of recent conference with the Court and the Diocese (.1); review correspondence with state court counsel and the Committee re same and next-steps (.1);	0.20	\$125.00

**Total Hours and Fees****105.50 \$69,618.00**

**Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Alyssa Turgeon	0.20	\$360.00	\$72.00
Brenda Horn	0.80	\$360.00	\$288.00
Brian Cawley	18.10	\$420.00	\$7,602.00
Jesse Bair	58.50	\$625.00	\$36,562.50
Leakhena Au	3.60	\$420.00	\$1,512.00
Nathan Kuenzi	0.20	\$420.00	\$84.00
Timothy Burns	24.10	\$975.00	\$23,497.50

**Total Due This Invoice: \$69,618.00**



10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 5/10/2023

**Bill # :** 01141

**Matter:** Insurance

**PROFESSIONAL SERVICES RENDERED**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
4/1/2023	Jesse Bair	Correspond with B. Cawley re BSA analysis project (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Additional analysis of materials re recent Diocesan insurance activities (.1); correspondence with I. Nasatir re recent Diocesan insurance activities (.1);	0.20	\$125.00
4/3/2023	Jesse Bair	Review correspondence from the Court re preliminary injunction hearing logistics (.1); participate in call with PSZJ team re same and related preparations (.4); participate in follow-up call with I. Nasatir re preliminary injunction insurance issues (.1);	0.60	\$375.00
4/3/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (4.0); analyze and summarize bankruptcy court holding for case law discussed by district court (1.9);	5.90	\$2,478.00
4/3/2023	Jesse Bair	Analyze recent KCIC article re Arrowood's financial condition (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Review the Debtor's reply in support of its tenth omnibus claims objection (.1);	0.10	\$62.50
4/3/2023	Jesse Bair	Review current draft of the Committee's preliminary injunction exhibit list (.1); review and respond to correspondence with G. Greenwood and I. Nasatir re potential additions to same (.2);	0.30	\$187.50
4/3/2023	Jesse Bair	Review G. Greenwood's draft language for the proposed joint pre-trial order re the preliminary injunction hearing (.1);	0.10	\$62.50



4/3/2023	Timothy Burns	Conference with J. Bair re preliminary injunction hearing strategy (.3); review agenda for April 5 hearing (.1); review Diocese reply brief re 10th Omnibus Claims Objection (.1); review the parties' status letter to the Court in LMI adversary proceeding (.1); review KCIC article re Arrowood's financial condition (.1); review Diocese of Brooklyn decision re Arrowood (.1); review Parishes' response re preliminary injunction motion (.1); review Merson Law plaintiffs' joinder re preliminary injunction motion (.1); review the Diocese's Ninth Omnibus Objection reply brief (.2);	1.20	\$1,170.00
4/3/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and upcoming preliminary injunction hearing (.3);	0.30	\$187.50
4/4/2023	Leakhena Au	Participate in BB team meeting re case status and ongoing insurance projects (.1)	0.10	\$42.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re preliminary injunction insurance strategy (.2);	0.20	\$125.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
4/4/2023	Timothy Burns	Review correspondence with J. Stang and state court counsel re appointment of mediator and related case issues (.2); participate in BB team meeting re case status and ongoing insurance projects (.1); review K. Dine correspondence re case developments and next-steps (.1); conference with J. Bair re preliminary injunction hearing issues (.2); participate in conference with J. Bair re Arrowood strategy (.1); conference with J. Bair re motion to dismiss strategy from insurance standpoint (.2);	0.90	\$877.50
4/4/2023	Brian Cawley	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$42.00
4/4/2023	Brian Cawley	Continue drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (4.0); continue analyzing bankruptcy court decision for information relevant to district court opinion (1.8); research case law relied upon by district court in connection with finalizing insurance summary (.7);	6.50	\$2,730.00
4/4/2023	Jesse Bair	Review K. Dine correspondence with state court counsel and Committee re case update and next-steps (.1);	0.10	\$62.50
4/4/2023	Jesse Bair	Participate in conference with T. Burns re motion to dismiss insurance issues (.2);	0.20	\$125.00
4/4/2023	Brenda Horn	Draft monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
4/4/2023	Jesse Bair	Analyze recent decision in the Arrowood v. Diocese of Brooklyn case for insurance issues relevant to DRVC matter (.2); draft status update to PSZJ team re same (.1);	0.30	\$187.50

4/4/2023	Nathan Kuenzi	Participate in BB team meeting re case status and ongoing insurance projects (.1);	0.10	\$42.00
4/4/2023	Jesse Bair	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$62.50
4/4/2023	Alyssa Turgeon	Participate in BB team conference re case status and related insurance projects (.1);	0.10	\$36.00
4/4/2023	Jesse Bair	Review motion to dismiss scheduling order (.1);	0.10	\$62.50
4/5/2023	Jesse Bair	Review correspondence with I. Nasatir and K. Brown re preparations for cross of K. Porter in connection with preliminary injunction hearing (.1);	0.10	\$62.50
4/5/2023	Jesse Bair	Review revised version of the Committee's proposed preliminary injunction exhibit list (.1); review correspondence with PSZJ team re same (.1);	0.20	\$125.00
4/5/2023	Jesse Bair	Review the Committee's motion to dismiss discovery requests served on the Diocese (.2);	0.20	\$125.00
4/5/2023	Timothy Burns	Attend hearing on claims objections for insurance purposes (3.0); participate in conference with J. Bair re preliminary injunction hearing presentation issues (.4);	3.40	\$3,315.00
4/5/2023	Jesse Bair	Review correspondence with PSZJ and the court re preliminary injunction hearing logistics (.1); participate in conference with T. Burns re preliminary injunction hearing presentation issues (.4);	0.50	\$312.50
4/5/2023	Jesse Bair	Attend hearing on claims objections for insurance purposes (3.0);	3.00	\$1,875.00
4/5/2023	Brian Cawley	Finish drafting memorandum summarizing recent BSA decision in connection with insurance issues relevant to DRVC case (5.4);	5.40	\$2,268.00
4/5/2023	Jesse Bair	Participate in call with I. Nasatir and G. Greenwood re preliminary injunction insurance exhibits (.3);	0.30	\$187.50
4/6/2023	Jesse Bair	Participate in portion of conference with PSZJ team re ongoing case issues for insurance purposes (.5);	0.50	\$312.50
4/6/2023	Timothy Burns	Review the Committee's motion to dismiss discovery requests (.2); review the Diocese's motion to dismiss discovery requests (.2);	0.40	\$390.00
4/6/2023	Jesse Bair	Review correspondence from K. Dine re case developments and motion to dismiss discovery (.1);	0.10	\$62.50
4/6/2023	Jesse Bair	Review correspondence with G. Greenwood and the Diocese re preliminary injunction hearing exhibits (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Review C. Moore preliminary injunction direct testimony declaration (.2);	0.20	\$125.00
4/7/2023	Jesse Bair	Review K. Porter preliminary injunction direct testimony declaration (.3); review K. Brown's potential objections to same (.1);	0.40	\$250.00
4/7/2023	Jesse Bair	Review and respond to correspondence with PSZJ team re the parishes' preliminary injunction response and potential reply to same (.2);	0.20	\$125.00
4/7/2023	Jesse Bair	Review the Diocese's letter to the Court re its 6th omnibus claims objection (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Review the Committee's motion to dismiss 30(b)(6) notice on the Diocese (.1);	0.10	\$62.50

4/7/2023	Jesse Bair	Review the Diocese's preliminary injunction reply brief (.7);	0.70	\$437.50
4/7/2023	Jesse Bair	Review the Diocese's preliminary injunction exhibit list (.1); review correspondence with K. Brown, G. Greenwood, and I. Nasatir re same (.1);	0.20	\$125.00
4/7/2023	Jesse Bair	Review E. Stephens preliminary injunction direct testimony declaration (.2);	0.20	\$125.00
4/9/2023	Jesse Bair	Analysis re insurance-related motion to dismiss discovery requests served on the Committee (.3); review and respond to various correspondence with A. Kornfeld, I. Nasatir, and G. Brown re potential responses to same (.3);	0.60	\$375.00
4/9/2023	Jesse Bair	Review additional correspondence with K. Brown re particular argument raised by the Diocese in its preliminary injunction reply brief (.1); review K. Dine suggested response to same (.1);	0.20	\$125.00
4/9/2023	Jesse Bair	Review and respond to correspondence with K. Brown re potential reply to the parishes' preliminary injunction response (.2);	0.20	\$125.00
4/9/2023	Jesse Bair	Review K. Brown correspondence re the Diocese's Section 157(b)(5) preliminary injunction argument and potential response to same (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Draft analysis of potential objections to and cross of K. Porter preliminary injunction direct testimony (.7);	0.70	\$437.50
4/10/2023	Jesse Bair	Respond to G. Brown correspondence re insurance-related motion to dismiss discovery and prior insurance-related document productions from the Diocese (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Analyze various district court orders referring the insurance actions to Magistrate Judge Cave for settlement purposes (.2); correspondence with PSZJ team re same (.2); correspondence with Reed Smith re same (.1);	0.50	\$312.50
4/10/2023	Jesse Bair	Review current draft of the parties' proposed joint pre-trial order (.2); correspondence with K. Brown, I. Nasatir, and G. Greenwood re same (.2);	0.40	\$250.00
4/10/2023	Jesse Bair	Review and edit current draft of the Committee's responses to the Diocese's motion to dismiss discovery requests (1.0);	1.00	\$625.00
4/10/2023	Jesse Bair	Analyze insurer settlement status and exposure analysis in advance of upcoming settlement call with Magistrate Cave (.2); correspondence with J. Stang re same (.1);	0.30	\$187.50
4/10/2023	Jesse Bair	Review correspondence with PSZJ and the Diocese re preliminary injunction exhibits and objections (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review K. Dine correspondence re case developments (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re preliminary injunction strategy (.1);	0.10	\$62.50

4/11/2023	Jesse Bair	Review revised version of the joint pre-trial order circulated by the Diocese (.1); review correspondence with PSZJ and the Diocese re same (.1);	0.20	\$125.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to K. Porter's direct testimony declaration (.4); review correspondence with I. Nasatir re same (.1);	0.50	\$312.50
4/11/2023	Timothy Burns	Analysis of Plan insurance options and settlement strategies (1.2); conference with J. Bair re same (.2); conference with J. Bair re meet and confer with Reed Smith re magistrate settlement conference (.1);	1.50	\$1,462.50
4/11/2023	Jesse Bair	Review the Diocese's motion to dismiss witness list (.1);	0.10	\$62.50
4/11/2023	Jesse Bair	Review additional district court orders referring the insurance actions to Magistrate Cave for settlement purposes (.2); review and respond to correspondence with PSZJ team re same (.2); correspondence with Reed Smith re same and meet and confer call (.1); participate in conference with T. Burns re same (.1);	0.60	\$375.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to E. Stephen's direct testimony declaration (.2);	0.20	\$125.00
4/11/2023	Jesse Bair	Review and edit the Committee's objection to C. Moore's direct testimony declaration (.3);	0.30	\$187.50
4/11/2023	Jesse Bair	Participate in conference with T. Burns re insurance-related Plan strategy (.2);	0.20	\$125.00
4/12/2023	Jesse Bair	Prepare for Reed Smith settlement conference meet and confer (.1); participate in pre-meeting conference with T. Burns re mediation strategy (.2); participate in Reed Smith settlement conference meet and confer (.4); participate in post-meeting conference with T. Burns re outcome of same and potential next-steps in advance of Friday call with Magistrate Judge Cave (.3);	1.00	\$625.00
4/12/2023	Jesse Bair	Review revised version of Porter direct testimony objection (.1);	0.10	\$62.50
4/12/2023	Jesse Bair	Review and consider additional settlement-related orders entered in the insurance district court actions (.2); correspondence with PSZJ team re same (.1);	0.30	\$187.50
4/12/2023	Jesse Bair	Participate in conference with PSZJ re mediation strategy and upcoming settlement conference call with Magistrate Judge Cave (.5); participate in post-call with T. Burns re same and next-steps (.2);	0.70	\$437.50
4/12/2023	Jesse Bair	Analysis re Arrowood's most recent statutory annual statement re the company's financial condition (.1);	0.10	\$62.50
4/12/2023	Jesse Bair	Review correspondence with K. Brown, I. Nasatir, and G. Greenwood re potential changes to the Committee's preliminary injunction exhibits (.1);	0.10	\$62.50

4/12/2023	Timothy Burns	Prepare for meet and confer with Reed Smith re mediation hearing before magistrate (.4); pre-meeting with J. Bair re same (.2); participate in meet and confer with Reed Smith (.4); post-meeting with J. Bair re follow-up (.3); participate in calls with state court counsel re same (.3); participate in conference with PSZJ re mediation strategy (.5); post-call with J. Bair re same and next-steps (.2); further consideration of mediation issues in advance of upcoming call with magistrate Cave (.5);	2.80	\$2,730.00
4/13/2023	Jesse Bair	Correspondence with I. Nasatir re Diocesan insurance coverage chart (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Analyze prior insurer settlement offers and counters (.1); draft insurance settlement overview for T. Burns in preparation for initial settlement call with Judge Cave (.1);	0.20	\$125.00
4/13/2023	Jesse Bair	Preliminary review of BSA decision relied upon by the Diocese in its preliminary injunction reply brief (.2); answer I. Nasatir question re same (.1); review related correspondence with I. Nasatir re same (.1);	0.40	\$250.00
4/13/2023	Jesse Bair	Correspondence with Reed Smith re meet and confer issues in advance of initial settlement call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Jesse Bair	Correspondence with PSZJ team re preliminary injunction hearing logistics (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Review mediation order entered in the bankruptcy case in preparation for initial settlement call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Jesse Bair	Review Judge Cave's settlement conference standing order in preparation for initial settlement call with Judge Cave (.2); correspondence with PSZJ team re same (.1);	0.30	\$187.50
4/13/2023	Timothy Burns	Email to paralegal re mediation materials (.1); met with J. Bair re mediation hearing issues (.1);	0.20	\$195.00
4/13/2023	Jesse Bair	Participate in conference with PSZJ team for insurance purposes re litigation strategy and ongoing case issues (1.0);	1.00	\$625.00
4/13/2023	Jesse Bair	Participate in conference with T. Burns re upcoming settlement conference call with Judge Cave (.2);	0.20	\$125.00
4/13/2023	Alyssa Turgeon	Research and identify various insurance case materials needed for review by T. Burns to prepare for upcoming mediation call with Judge Cave (1.7);	1.70	\$612.00
4/13/2023	Jesse Bair	Review correspondence with G. Greenwood and K. Brown re preliminary injunction joint pretrial order (.1);	0.10	\$62.50
4/13/2023	Jesse Bair	Review monthly PSIP information received from the Debtor (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Review draft letter to the Court re the Committee's position re the parishes' and Diocese's position re enforcement of CVA judgments against parishes assets (.1);	0.10	\$62.50

4/14/2023	Jesse Bair	Review final version of the Committee's responses to the Diocese's motion to dismiss discovery requests (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Participate in call with J. Stang, K. Dine, and T. Burns re outcome of Judge Cave initial settlement conference call and next-steps re case mediation (.3);	0.30	\$187.50
4/14/2023	Jesse Bair	Participate in initial settlement conference call with Judge Cave (1.0); participate in post-call conference with T. Burns re outcome of same and next-steps (.2);	1.20	\$750.00
4/14/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re litigation and mediation updates and strategy (.8);	0.80	\$500.00
4/14/2023	Timothy Burns	Detailed review of case insurance materials in preparation for mediation call with Magistrate Judge Cave and the insurers (2.4); conference with J. Bair re same (.3); participate in call with Reed Smith re same (.2); participate in mediation call with Judge Cave and the insurers (1.0); participate in post-hearing conference with J. Bair re outcome of same and next-steps (.2); post-hearing call with PSZJ and J. Bair re same (.3); participate in calls with state court counsel re Arrowood issues (.4); participate in state court counsel meeting for insurance purposes re mediation strategy (.8);	5.60	\$5,460.00
4/14/2023	Jesse Bair	Prepare for initial settlement conference call with Judge Cave, including conference with T. Burns re same (.4);	0.40	\$250.00
4/14/2023	Jesse Bair	Review the Diocese's letter to the Committee re the scope of the preliminary injunction order and the related insurance schedules (.1);	0.10	\$62.50
4/14/2023	Jesse Bair	Review correspondence from P. Van Osselaer re mediation developments (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Review the Debtor's letter to the Court objecting to potential Bishop deposition (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Review the Committee's letter to the Court re potential Bishop deposition (.1);	0.10	\$62.50
4/15/2023	Jesse Bair	Correspondence with I. Nasatir re the agreed coverage summary (.1);	0.10	\$62.50
4/16/2023	Jesse Bair	Review and edit draft Porter cross examination for trial (2.1); correspondence with I. Nasatir re same (.1);	2.20	\$1,375.00
4/16/2023	Jesse Bair	Review K. Brown correspondence re insurance preliminary injunction arguments (.1);	0.10	\$62.50
4/16/2023	Jesse Bair	Research case law supporting the proposition that insurers act in bad faith if they tender their per occurrence limits solely to end their duty to defend (.4); correspondence with I. Nasatir re same (.1);	0.50	\$312.50
4/16/2023	Jesse Bair	Additional analysis of BSA opinion cited by the Diocese in support of its preliminary injunction reply brief (.2); review and respond to I. Nasatir correspondence re same (.2);	0.40	\$250.00

4/16/2023	Timothy Burns	Review Diocese's apex deposition letter (.1); review the Committee's response to same (.1); review letter from Committee to Judge Glenn re need for court approval before executing on CVA judgment against parish assets (.1);	0.30	\$292.50
4/17/2023	Jesse Bair	Review draft Committee response to the Diocese's letter re meet and confer re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Review and consider judicial notice of appointment of mediator (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Correspondence with I. Nasatir re Porter cross examination strategy (.1);	0.10	\$62.50
4/17/2023	Timothy Burns	Reviewed email from PSZJ re magistrate hearing (.1) and Bankruptcy Court hearing (.1);	0.20	\$195.00
4/17/2023	Jesse Bair	Review the Diocese's response to the Committee's preliminary injunction witness objections (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Additional correspondence with I. Nasatir re potential preliminary injunction insurance exhibit (.1);	0.10	\$62.50
4/17/2023	Jesse Bair	Review J. Stang correspondence to the Committee re case developments and potential motion to dismiss delay (.1);	0.10	\$62.50
4/18/2023	Jesse Bair	Review revised draft response to the Diocese's letter re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/18/2023	Timothy Burns	Participate in call with the mediator re upcoming settlement call and related issues (.5);	0.50	\$487.50
4/18/2023	Jesse Bair	Review K. Brown correspondence re preliminary injunction arguments in advance of hearing (.1);	0.10	\$62.50
4/18/2023	Jesse Bair	Review Order setting additional pre-settlement conference call with Judge Cave and PVO (.1);	0.10	\$62.50
4/19/2023	Jesse Bair	Review Order sustaining the Diocese's fifth omnibus claims objection (.3);	0.30	\$187.50
4/19/2023	Jesse Bair	Review supplemental letter to the court from the Diocese re related insurance schedules and associated proofs of claim (.1);	0.10	\$62.50
4/19/2023	Jesse Bair	Review various correspondence with J. Stang, the Diocese, the US Trustee, the Committee, and state court counsel re potential extension of the preliminary injunction and parameters re same (.2);	0.20	\$125.00
4/19/2023	Timothy Burns	Participate in call with state court counsel re Arrowood issues (.8);	0.80	\$780.00
4/20/2023	Timothy Burns	Participate in conference with J. Bair re upcoming settlement call with Judge Cave and PVO (.1);	0.10	\$97.50
4/20/2023	Jesse Bair	Analyze C. Moore expert report for insurance issues and critiques (.5); draft summary of same for PSZJ (.2);	0.70	\$437.50
4/20/2023	Jesse Bair	Participate in conference with T. Burns re preliminary injunction hearing outcome and settlements issues (.2);	0.20	\$125.00
4/20/2023	Jesse Bair	Participate in conference with T. Burns re upcoming settlement call with Judge Cave and PVO (.1);	0.10	\$62.50

4/20/2023	Timothy Burns	Participate in conference with J. Bair re preliminary injunction hearing outcome and settlements issues (.2);	0.20	\$195.00
4/20/2023	Timothy Burns	Participate in conference with PSZJ team re ongoing case issues for insurance purposes (.9);	0.90	\$877.50
4/20/2023	Jesse Bair	Review K. Dine correspondence to the Committee re preliminary injunction hearing outcome and mediation developments (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Analyze Judge Cave's mediation scheduling order (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Review correspondence with PSZJ team re upcoming settlement call with Judge Cave and PVO and strategy re same (.1);	0.10	\$62.50
4/21/2023	Timothy Burns	Prepare for settlement call with Judge Cave (.4); participate in settlement call (1.0); participate in portion of state court counsel meeting re outcome of same and related mediation issues (.5); participate in conference with J. Bair re outcome of same (.1);	2.00	\$1,950.00
4/21/2023	Jesse Bair	Review B. Michael correspondence re motion to dismiss adjournment (.1);	0.10	\$62.50
4/21/2023	Jesse Bair	Participate in pre-settlement conference call with Judge Cave and PVO re structure and logistics for upcoming case mediation sessions (1.0);	1.00	\$625.00
4/21/2023	Jesse Bair	Participate in conference with T. Burns re outcome of state court counsel meeting (.1);	0.10	\$62.50
4/22/2023	Jesse Bair	Review materials re recent Diocesan insurance activities (.2);	0.20	\$125.00
4/22/2023	Jesse Bair	Analyze B. Cawley memorandum re recent BSA decision re insurance issues potentially impacting DRVC case (.6);	0.60	\$375.00
4/24/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy re upcoming mediation sessions (.2);	0.20	\$195.00
4/24/2023	Jesse Bair	Correspondence with B. Michael re upcoming mediation sessions (.1); correspondence with T. Burns and K. Dempski re same (.1);	0.20	\$125.00
4/24/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy re upcoming mediation sessions (.2);	0.20	\$125.00
4/24/2023	Jesse Bair	Review correspondence from B. Michael re impacted CVA cases if the Court denies the preliminary injunction (.1); review spreadsheet re same (.1);	0.20	\$125.00
4/24/2023	Jesse Bair	Review minute entries in insurance district court actions re upcoming mediation sessions (.1);	0.10	\$62.50
4/24/2023	Jesse Bair	Review correspondence from B. Michael and J. Stang re weekly case strategy meeting (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review information re logistics for upcoming May mediation sessions (.1);	0.10	\$62.50
4/25/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy re upcoming mediation sessions (.1);	0.10	\$97.50
4/25/2023	Jesse Bair	Prepare for hearing on professional interim fee applications (.1); participate in hearing re BB's interim fee application (.7);	0.80	\$500.00



4/25/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy re upcoming mediation sessions (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review CFN's objection to the revised sale order (.1);	0.10	\$62.50
4/25/2023	Jesse Bair	Review correspondence with the Committee and B. Michael re May 19 mediation session (.1);	0.10	\$62.50
4/26/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy in advance of upcoming mediation sessions (.1);	0.10	\$62.50
4/26/2023	Timothy Burns	Review correspondence with PSZJ and the Diocese re expert issues (.1);	0.10	\$97.50
4/26/2023	Jesse Bair	Review and edit initial draft of mediation confidentiality agreement circulated by Arrowood (.1); correspondence with PSZJ re potential edits to same (.1);	0.20	\$125.00
4/26/2023	Jesse Bair	Review draft post-trial order re preliminary injunction evidence and insurance information (.2); review correspondence with B. Michael, I. Nasatir, K. Brown, and G. Greenwood re suggested edits to same (.2);	0.40	\$250.00
4/26/2023	Timothy Burns	Participate in conference with J. Bair re insurance strategy in advance of upcoming mediation sessions (.1);	0.10	\$97.50
4/27/2023	Timothy Burns	Participate in conference with J. Bair re Arrowood strategy (.2);	0.20	\$195.00
4/27/2023	Jesse Bair	Review and edit initial draft of the Committee's mediation statement (.6); review I. Nasatir's suggested edits to same (.2); review correspondence from K. Dine and B. Michael re additional potential edits to same (.1);	0.90	\$562.50
4/27/2023	Jesse Bair	Analysis re various insurance questions from Claro re supplemental insurer exposure and allocation analysis (.3); correspondence with Claro re same (.1);	0.40	\$250.00
4/27/2023	Jesse Bair	Review mediator directive re May mediation sessions (.1);	0.10	\$62.50
4/27/2023	Jesse Bair	Review final version of stipulation and order re preliminary injunction evidence and certain insurance information (.1);	0.10	\$62.50
4/27/2023	Jesse Bair	Review correspondence with Arrowood, the mediators, and B. Michael re mediation confidentiality and process issues (.2);	0.20	\$125.00
4/27/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy (.2);	0.20	\$125.00
4/27/2023	Jesse Bair	Review correspondence from B. Michael re potential mediation agenda for May 10 session (.1);	0.10	\$62.50
4/27/2023	Timothy Burns	Review correspondence from PSZJ re upcoming mediation session (.1);	0.10	\$97.50
4/28/2023	Jesse Bair	Analyze and respond to further Claro insurance questions re supplemental insurance exposure and allocation analysis (.3);	0.30	\$187.50

4/28/2023	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting for insurance purposes re mediation strategy (1.3); participate in post-call with PSZJ and T. Burns re same (.4);	1.80	\$1,125.00
4/28/2023	Timothy Burns	Review and revise the Committee's mediation statement (.9); participate in call with J. Bair re same (.2); participate in state court counsel meeting for insurance purposes re mediation strategy (1.3); participate in post-meeting call with PSZJ and J. Bair re same (.4);	2.80	\$2,730.00
4/28/2023	Jesse Bair	Review and edit revised version of the Committee's mediation statement incorporating edits from T. Burns (.3); participate in call with T. Burns re same (.2);	0.50	\$312.50
4/28/2023	Jesse Bair	Review alternative mediation confidentiality agreement circulated by Judge Cave (.1);	0.10	\$62.50
4/28/2023	Jesse Bair	Review and edit revised mediation confidentiality agreement circulated by Arrowood (.1); correspondence with B. Michael and J. Stang re same (.1);	0.20	\$125.00
4/28/2023	Jesse Bair	Review and edit most recent draft of the Committee's mediation statement (.4); correspondence with T. Burns re same (.1);	0.50	\$312.50
4/29/2023	Jesse Bair	Review LMI and the Diocese's letter to Judge Cronan re settlement update (.1);	0.10	\$62.50
4/29/2023	Jesse Bair	Review revised version of the Committee's mediation statemen (.1); review correspondence with B. Michael and state court counsel re same (.1);	0.20	\$125.00
4/30/2023	Jesse Bair	Analysis re Arrowood Guarantee Fund exposure (.2); correspondence with I. Nasatir, J. Stang, and state court counsel re same (.2);	0.40	\$250.00
<b>Total Hours and Fees</b>			<b>87.20</b>	<b>\$58,710.50</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/1/2023	First Quarter 2023 PACER (Public Access to Court Electronic Records)	\$98.90
<b>Total Expenses</b>		<b>\$98.90</b>

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.80	\$360.00	\$648.00
Brenda Horn	0.80	\$360.00	\$288.00
Brian Cawley	17.90	\$420.00	\$7,518.00
Jesse Bair	41.90	\$625.00	\$26,187.50
Leakhena Au	0.10	\$420.00	\$42.00
Nathan Kuenzi	0.10	\$420.00	\$42.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Timothy Burns	24.60	\$975.00	\$23,985.00

**Total Due This Invoice: \$58,809.40**



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Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 6/1/2023

**Bill # :** 01146

**Matter:** Insurance

**PROFESSIONAL SERVICES RENDERED**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2023	Leakhena Au	Participate in BB team conference re case developments and projects (.2);	0.20	\$84.00
5/1/2023	Jesse Bair	Participate in BB team conference re case developments and projects (.2);	0.20	\$125.00
5/1/2023	Timothy Burns	Conference with J. Bair re mediation strategy (.1); conference with BB team re insurance strategy and related assignments (.2); review and respond to B. Michael correspondence re Committee mediation brief (.1); further review of Committee mediation statement (.2); review correspondence from J. Bair re Arrowood exposure (.1);	0.70	\$682.50
5/1/2023	Jesse Bair	Review correspondence with B. Michael and I. Nasatir re Arrowood issues in connection with the Committee's mediation statement (.1); review T. Burns correspondence re same (.1);	0.20	\$125.00
5/1/2023	Brian Cawley	Participate in BB team conference re insurance strategy and related assignments (.2)	0.20	\$84.00
5/1/2023	Jesse Bair	Review revised version of the Committee's mediation statement (.1);	0.10	\$62.50
5/1/2023	Alyssa Turgeon	Participate in BB team conference re insurance strategy and related assignments (.2)	0.20	\$72.00
5/1/2023	Jesse Bair	Review the Court's Order granting in part and over-ruling in part the Diocese's 8th omnibus claims objection (.6);	0.60	\$375.00
5/1/2023	Alyssa Turgeon	Draft mediation preparation binder for T. Burns (0.5);	0.50	\$180.00
5/1/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.1);	0.10	\$62.50

5/1/2023	Jesse Bair	Review K. Dine and B. Michael correspondence to the Committee re case developments and mediation (.1);	0.10	\$62.50
5/1/2023	Jesse Bair	Review the Diocese's requests for admission to Arrowood re policy terms and language (.2);	0.20	\$125.00
5/1/2023	Nathan Kuenzi	Participate in BB team conference re case developments and projects (.2);	0.20	\$84.00
5/2/2023	Jesse Bair	Attend May 2 hearing re CFN sale for insurance purposes (.3);	0.30	\$187.50
5/2/2023	Jesse Bair	Review and edit revised version of the Committee's draft mediation statement, incorporating new Claro figures (.4); review and respond to correspondence with B. Michael re same and related insurance issues (.2);	0.60	\$375.00
5/2/2023	Timothy Burns	Review and revise updated version of the Committee's mediation statement (.7); review correspondence with J. Bair and B. Michael re same (.2);	0.90	\$877.50
5/2/2023	Jesse Bair	Analyze Claro's revised valuation and insurance allocation analysis (.2);	0.20	\$125.00
5/3/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re recent CVA jury verdict (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Correspondence with B. Michael and I. Nasatir re LMI SIR issues (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Review the Diocese's mediation statement (.4);	0.40	\$250.00
5/3/2023	Jesse Bair	Participate in call with B. Michael and I. Nasatir re BSA impact, if any, on DRVC claims (.3);	0.30	\$187.50
5/3/2023	Jesse Bair	Review the parishes' mediation statement (.3);	0.30	\$187.50
5/4/2023	Jesse Bair	Review and respond to correspondence with PSZJ team and the mediators regarding potential exchange of redacted Committee mediation statement with the carriers (.2); conference with T. Burns re same and overall insurance strategy for upcoming mediation sessions (.2);	0.40	\$250.00
5/4/2023	Jesse Bair	Review follow-up correspondence from the mediators re exchange of meditation information and related issues (.1);	0.10	\$62.50
5/4/2023	Jesse Bair	Participate in portion of meeting with PSZJ team re mediation strategy for insurance purposes (.7); participate in follow-up conference with T. Burns re outcome of same and agenda for upcoming mediation session (.1);	0.80	\$500.00
5/4/2023	Jesse Bair	Participate in call with Claro re insurance allocation issues (.2);	0.20	\$125.00
5/4/2023	Nathan Kuenzi	Begin researching Delaware law re unfair claims handling practices in connection with Arrowood strategy (.7);	0.70	\$294.00

5/4/2023	Jesse Bair	Review draft Claro mediation presentation (.3);	0.30	\$187.50
5/4/2023	Timothy Burns	Participate in call with state court counsel re insurance mediation strategy (.1); participate in call with J. Stang re same (.6);	0.70	\$682.50
5/4/2023	Jesse Bair	Participate in conference with B. Cawley re instructions for preparing Committee insurance presentation for upcoming mediation session (.4); draft follow-up correspondence to B. Cawley providing supplemental instructions and attaching various case materials needed to prepare presentation (.3);	0.70	\$437.50
5/4/2023	Brian Cawley	Participate in conference with J. Bair re instructions for preparing Committee insurance presentation for upcoming mediation session (.4); analyze documents sent by J. Bair in connection with preparing insurance presentation (.9); begin drafting Committee insurance mediation presentation (.2);	1.50	\$630.00
5/5/2023	Nathan Kuenzi	Draft outline of memorandum for T. Burns re unfair claims handling practices in connection with Arrowood strategy (.5);	0.50	\$210.00
5/5/2023	Jesse Bair	Participate in supplemental call with T. Burns re outcome of state court counsel meeting and preparations in advance of upcoming mediation session (.1);	0.10	\$62.50
5/5/2023	Timothy Burns	Participate in conference with J. Bair re the Committee's mediation statement and upcoming mediation session (.2); participate in additional conference with J. Bair re insurance strategy for upcoming mediation session (.1);	0.30	\$292.50
5/5/2023	Brian Cawley	Continue drafting Committee insurance mediation presentation (2.2); participate in conference with J. Bair re same and potential edits (.2); correspondence with J. Bar re same (.1);	2.50	\$1,050.00
5/5/2023	Jesse Bair	Conference with B. Cawley and answer questions re preparation of Committee insurance presentation for upcoming mediation session (.2);	0.20	\$125.00
5/5/2023	Brian Cawley	Continue drafting Committee insurance mediation presentation (4.0);	4.00	\$1,680.00
5/5/2023	Jesse Bair	Participate in call with T. Burns re Arrowood and mediation strategy (.1)	0.10	\$62.50
5/5/2023	Nathan Kuenzi	Continue detailed research re Delaware common law, statutes, and regulations re unfair claims handling practices in connection with Arrowood strategy (5.5);	5.50	\$2,310.00

5/5/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation preparations and strategy for upcoming sessions (1.2);	1.20	\$750.00
5/5/2023	Jesse Bair	Review Reed Smith supplemental submission re insurance expert work (.1);	0.10	\$62.50
5/5/2023	Jesse Bair	Correspondence with I. Nasatir re Committee insurance mediation presentation (.1);	0.10	\$62.50
5/6/2023	Jesse Bair	Review Claro analysis re revised insurance "buckets" for POCs (.1); correspondence with Claro re same and additional analysis needed (.1);	0.20	\$125.00
5/6/2023	Jesse Bair	Begin reviewing and editing initial draft of the Committee's insurance mediation presentation, including drafting additional sections of same (1.9);	1.90	\$1,187.50
5/7/2023	Jesse Bair	Analyze and incorporate T. Burns' suggested edits into draft Committee insurance mediation presentation (.2); correspondence with I. Nasatir re same (.1);	0.30	\$187.50
5/7/2023	Nathan Kuenzi	Continue detailed research re Delaware common law, statutes, and regulations re unfair claims handling practices in connection with Arrowood strategy (1.5);	1.50	\$630.00
5/7/2023	Jesse Bair	Review J. Stang correspondence re draft Committee insurance mediation presentation (.1);	0.10	\$62.50
5/7/2023	Jesse Bair	Continue reviewing and editing initial draft of the Committee's insurance mediation presentation, including drafting additional sections of same (1.3);	1.30	\$812.50
5/8/2023	Alyssa Turgeon	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$36.00
5/8/2023	Jesse Bair	Participate in conference with T. Burns re outcome of call with the mediator (.2);	0.20	\$125.00
5/8/2023	Timothy Burns	Participate in call with the mediator re insurance issues and upcoming mediation sessions (1.0); participate in follow-up meeting with J. Bair re same and outcome of mediator call (.2); participate in BB team conference re case strategy and related assignments (.1); review the Diocese's motion to quash certain Arrowood subpoenas (.1);	1.40	\$1,365.00
5/8/2023	Nathan Kuenzi	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$42.00
5/8/2023	Leakhena Au	Participate in BB team meeting re case developments and related assignment (.1);	0.10	\$42.00
5/8/2023	Jesse Bair	Correspond with T. Burns re key insurance materials for review in advance of upcoming mediation session (.1);	0.10	\$62.50
5/8/2023	Jesse Bair	Review the Diocese's motion to quash certain Arrowood subpoenas (.1);	0.10	\$62.50

5/8/2023	Jesse Bair	Participate in BB team meeting re case developments and related assignment (.1);	0.10	\$62.50
5/8/2023	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$62.50
5/8/2023	Nathan Kuenzi	Finish research re Delaware unfair claims handling practices in connection with Arrowood strategy (1.9); draft email memorandum for T. Burns summarizing research re same (2.3);	4.20	\$1,764.00
5/8/2023	Jesse Bair	Participate in conference and provide instructions to B. Cawley re preparing supplemental insurance presentations for potential use during upcoming mediation sessions (.4);	0.40	\$250.00
5/8/2023	Brian Cawley	Participate in conference with J. Bair re preparing supplemental insurance presentations for potential use during upcoming mediation sessions (.4);	0.40	\$168.00
5/8/2023	Brian Cawley	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$42.00
5/9/2023	Nathan Kuenzi	Draft supplemental email memorandum for T. Burns addressing additional unfair claims practices issues under Delaware law in connection with Arrowood strategy (1.2);	1.20	\$504.00
5/9/2023	Timothy Burns	Travel from Madison to New York for mediation [billed at 1/2 travel rate] (5.8);	5.80	\$2,827.50
5/9/2023	Brian Cawley	Draft additional Committee insurance mediation presentation focusing on unfair claims handling and deceptive practices issues (2.0); draft additional Committee insurance mediation presentation with particular focus on certain LMI/Interstate issues (1.4); correspondence with J. Bair re insurance presentations (.1);	3.50	\$1,470.00
5/9/2023	Timothy Burns	Participate in call with J. Bair re Arrowood litigation strategy (.2); prepare for call with state court counsel re Arrowood issues and strategy (.8); participate in call with state court counsel group re same (.8); prepare for upcoming mediation session, including review of the parties' mediation statements, draft presentations, and other case insurance materials (3.1); participate in conference with J. Bair re mediation strategy (.5);	5.40	\$5,265.00
5/9/2023	Jesse Bair	Participate in conference with T. Burns re mediation preparations and strategy (.5);	0.50	\$312.50



5/9/2023	Jesse Bair	Review and edit initial draft of PSZJ mediation presentation (.3); review correspondence with G. Greenwood and I. Nasatir re potential edits to same (.2); review I. Nasatir's suggested changes to same (.2); draft additional insurance sections of same (.2); continue analyzing insurance materials in preparation for tomorrow's mediation session (.1);	1.00	\$625.00
5/9/2023	Jesse Bair	Participate in call with T. Burns re Arrowood litigation strategy (.2);	0.20	\$125.00
5/9/2023	Jesse Bair	Travel from Madison to New York for mediation [billed at 1/2 travel rate] (7.2);	7.20	\$2,250.00
5/9/2023	Nathan Kuenzi	Research issues regarding insurance commissioner oversight and regulatory actions re insolvent insurance companies in connection with Arrowood strategy (3.3);	3.30	\$1,386.00
5/9/2023	Jesse Bair	Draft supplemental presentation for potential use at upcoming mediation re alternative insurance settlement strategies (.9);	0.90	\$562.50
5/9/2023	Jesse Bair	Review insurance portion of prior Committee mediation statement recently sent to Judge Cave (.1);	0.10	\$62.50
5/10/2023	Jesse Bair	Participate in post-mediation session meeting with PSZJ, T. Burns, and state court counsel re outcome of session and next-steps re case mediation (.5);	0.50	\$312.50
5/10/2023	Timothy Burns	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (5.4);	5.40	\$2,632.50
5/10/2023	Timothy Burns	Participate in pre-mediation meeting with PSZJ and J. Bair re strategy for upcoming session and related presentations (1.5); participate in Committee-only mediation session (5.1); participate in post-mediation session meeting with PSZJ and state court counsel re outcome of session and next-steps (.5);	7.10	\$6,922.50
5/10/2023	Jesse Bair	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (4.6);	4.60	\$1,437.50
5/10/2023	Jesse Bair	Analyze coverage materials in preparation for mediation session (.3);	0.30	\$187.50
5/10/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re outcome of mediation session and next-steps (1.1);	1.10	\$687.50
5/10/2023	Jesse Bair	Review Claro revised mediation presentation (.2);	0.20	\$125.00
5/10/2023	Jesse Bair	Participate in pre-mediation meeting with PSZJ and T. Burns re strategy for upcoming session and related presentations (1.5);	1.50	\$937.50
5/10/2023	Jesse Bair	Participate in Committee-only mediation session with Judge Cave and Paul van Osselaer (5.1);	5.10	\$3,187.50

5/10/2023	Jesse Bair	Review B. Cawley drafts of mediation presentations re potential alternative settlements strategies (.2);	0.20	\$125.00
5/10/2023	Brenda Horn-Edwards	Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
5/11/2023	Jesse Bair	Review Committee agenda for upcoming team strategy call (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Brief review re Arrowood's 30(b)(6) notice on the Diocese (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Review Arrowood's motion to compel letter to the Court re Diocesan deposition testimony (.2);	0.20	\$125.00
5/11/2023	Jesse Bair	Prepare for call with T. Law re Arrowood discovery issues (.1); participate in call with T. Law re same (.2);	0.30	\$187.50
5/11/2023	Jesse Bair	Review correspondence with B. Michael, J. Stang, and the Committee re additional Thursday mediation session (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Participate in call with T. Burns re outcome of strategy call with PSZJ and insurance strategy for upcoming mediation session (.3);	0.30	\$187.50
5/11/2023	Jesse Bair	Participate in conference with B. Cawley re mediation session outcome and next-steps (.2);	0.20	\$125.00
5/11/2023	Timothy Burns	Participate in weekly team strategy call with PSZJ for insurance purposes re ongoing case tasks and strategy (1.4); participate in call with I. Nasatir re notice testimony (.2); participate in call with J. Bair re insurance strategy for upcoming mediation session (.3); additional analysis re same (.4); participate in call with state court counsel re same (.2);	2.50	\$2,437.50
5/11/2023	Jesse Bair	Participate in call with B. Michael re Arrowood discovery and case insurance issues (.3);	0.30	\$187.50
5/12/2023	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.2); review correspondence from B. Michael re upcoming mediation session (.1); review correspondence from B. Michael re agenda for upcoming state court counsel meeting (.1); review Arrowood's letter re motion to compel deposition testimony (.1); review Arrowood's response to the Diocese's motion to quash (.2); review the Diocese's response to Arrowood's letter to the court re deposition motion to compel (.2); participate in call with J. Bair re outcome of state court counsel meeting and related insurance issues (.2);	1.10	\$1,072.50
5/12/2023	Jesse Bair	Review Arrowood's response to the Diocese's motion to quash certain subpoenas (.2);	0.20	\$125.00

5/12/2023	Jesse Bair	Review correspondence from the mediators re supplemental May 18 mediation session (.1);	0.10	\$62.50
5/12/2023	Jesse Bair	Review prior Committee intervention briefing in the Arrowood insurance adversary proceeding (.2); participate in conference with L. Au re supplemental research needed re same in connection with potential expanded Committee discovery rights in Arrowood district court action (.2);	0.40	\$250.00
5/12/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.2);	0.20	\$125.00
5/12/2023	Jesse Bair	Brief review of case law re the scope of a Committee's intervention rights under Section 1109(b) (.2); review the district court's prior order granting in part and denying in part Arrowood's earlier motion to compel (.1); draft correspondence to the Diocese re Committee attendance at all future depositions in the Arrowood district court action (.4);	0.70	\$437.50
5/12/2023	Jesse Bair	Participate in conference with PSZJ team re Plan issues and related strategy (.8);	0.80	\$500.00
5/12/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.7); participate in follow-up call with T. Burns re outcome of same and next-steps (.2);	0.90	\$562.50
5/12/2023	Leakhena Au	Detailed research re Second Circuit case law re the parameters of a Committee's discovery and other litigation rights as a party in interest under Section 1109(b) in connection with Arrowood adversary proceeding (6.8);	6.80	\$2,856.00
5/12/2023	Jesse Bair	Review the Diocese's response to Arrowood's motion to compel deposition testimony (.2);	0.20	\$125.00
5/13/2023	Jesse Bair	Review T. Burns correspondence re writ of mandamus filed by the Diocese of Brooklyn seeking to compel the Delaware Insurance Commissioner to put Arrowood into liquidation (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Review the Diocese of Brooklyn's writ of mandamus seeking to compel the Delaware Insurance Commissioner to put Arrowood into liquidation (.4);	0.40	\$250.00
5/15/2023	Jesse Bair	Review and respond to correspondence with B. Michael and I. Nasatir re the Diocese of Brooklyn's Arrowood writ and Committee attendance at future Arrowood depositions (.2);	0.20	\$125.00
5/15/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.3);	0.30	\$187.50
5/15/2023	Alyssa Turgeon	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$36.00

5/15/2023	Nathan Kuenzi	Participate in BB team conference re insurance strategy and case assignments (.1);	0.10	\$42.00
5/15/2023	Jesse Bair	Review Judge Rochon's order in the Arrowood district court action re hearing on the parties' current discovery disputes (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Review and respond to correspondence with Reed Smith re Committee attendance at future depositions in the Arrowood district court action (.2);	0.20	\$125.00
5/15/2023	Leakhena Au	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$42.00
5/15/2023	Jesse Bair	Correspondence with B. Cawley re Diocese of Brooklyn expert affidavit filed in connection with Arrowood writ (.1);	0.10	\$62.50
5/15/2023	Brian Cawley	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$42.00
5/15/2023	Leakhena Au	Continue detailed research re Second Circuit case law re the parameters of a Committee's discovery and other litigation rights as a party in interest under Section 1109(b) in connection with Arrowood adversary proceeding (3.6); draft email memorandum summarizing research results (1.8);	5.40	\$2,268.00
5/15/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case mediation and litigation strategy (.7);	0.70	\$437.50
5/15/2023	Timothy Burns	Participate in conference with J. Bair re case insurance strategy (.3); participate in call with state court counsel re insurance strategy (.1); participate in BB team meeting re case strategy and related assignments (.1); participate in call with state court counsel and J. Bair re Arrowood issue (.3); review research results re scope of the Committee's intervention rights (.2); review agenda for upcoming Committee meeting (.1); participate in Committee meeting for insurance purposes re case mediation and litigation strategy (1.0); participate in post-call with I. Nasatir re Arrowood issues (.2);	2.30	\$2,242.50
5/15/2023	Jesse Bair	Participate in conference with T. Burns and state court counsel re Arrowood strategy (.3);	0.30	\$187.50
5/16/2023	Brian Cawley	Research regarding writ of mandamus exhibits submitted in Delaware action requesting that the Delaware Insurance Commissioner put Arrowood into liquidation (1.2); correspondence with J. Bair and T. Burns re same (.2);	1.40	\$588.00
5/16/2023	Jesse Bair	Review correspondence with the Diocese and PSZJ re upcoming mediation session (.1);	0.10	\$62.50

5/16/2023	Jesse Bair	Answer L. Au questions re Arrowood litigation project (.1);	0.10	\$62.50
5/16/2023	Jesse Bair	Participate in conference with T. Burns and L. Au re Arrowood strategy and related assignments (.4);	0.40	\$250.00
5/16/2023	Leakhena Au	Begin drafting proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (6.4);	6.40	\$2,688.00
5/16/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.4);	0.40	\$250.00
5/16/2023	Jesse Bair	Attend Court hearing for insurance purposes re claim objection discovery issues (.9);	0.90	\$562.50
5/16/2023	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.4); participate in conference with J. Bair and L. Au re Arrowood strategy and related assignments (.4); review correspondence with the Diocese and PSZJ re upcoming mediation session (.2); begin preparing for next mediation session (.1); attend Court hearing for insurance purposes re claim objection discovery issues (.9);	2.00	\$1,950.00
5/17/2023	Leakhena Au	Draft email summary re cause of action against Arrowood re Arrowood's unfair and deceptive claims practices (1.1);	1.10	\$462.00
5/17/2023	Jesse Bair	Review the Diocese of Brooklyn's expert affidavit re Arrowood's financial condition (.3); correspondence with I. Nasatir re same (.1);	0.40	\$250.00
5/17/2023	Leakhena Au	Continue drafting proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (4.6);	4.60	\$1,932.00
5/17/2023	Jesse Bair	Preliminary research re potential Arrowood claim (.1);	0.10	\$62.50
5/17/2023	Jesse Bair	Review the parties' joint status update letter to the Court in the Evanston district court action (.1);	0.10	\$62.50
5/18/2023	Timothy Burns	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (5.2);	5.20	\$2,535.00
5/18/2023	Jesse Bair	Prepare for mediation session (.1); participate in day 1 of mediation (3.7); participate in post-mediation meeting with J. Stang and T. Burns re case insurance strategy (1.0);	4.80	\$3,000.00
5/18/2023	Jesse Bair	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (4.6);	4.60	\$1,437.50
5/18/2023	Leakhena Au	Analysis re alternative strategies for bringing unfair claims practices cause of action against Arrowood (2.4);	2.40	\$1,008.00
5/18/2023	Timothy Burns	Participate in day 1 of mediation (3.7); participate in post-mediation meeting with J. Stang and J. Bair re case insurance strategy (1.0);	4.70	\$4,582.50

5/18/2023	Jesse Bair	Review the Diocese's and Arrowood's letter to Judge Rochon re upcoming discovery dispute hearing (.1);	0.10	\$62.50
5/19/2023	Timothy Burns	Participate in day 2 of mediation session (13.4);	13.40	\$13,065.00
5/19/2023	Jesse Bair	Participate in portion of day 2 of mediation session (11.8);	11.80	\$7,375.00
5/19/2023	Timothy Burns	Travel Rate for local travel to and from mediation [billed at 1/2 travel time] (1.0);	1.00	\$487.50
5/19/2023	Jesse Bair	Return travel from New York mediation to Madison [billed at 1/2 travel time] (3.1);	3.10	\$968.75
5/20/2023	Timothy Burns	Return travel from New York mediation to Madison [billed at 1/2 travel time] (8.6);	8.60	\$4,192.50
5/20/2023	Jesse Bair	Review correspondence with state court counsel re mediation strategy (.1);	0.10	\$62.50
5/21/2023	Jesse Bair	Correspondence with T. Burns re outcome of state court counsel meeting re potential mediation counter (.1);	0.10	\$62.50
5/21/2023	Jesse Bair	Prepare for state court counsel meeting (.1); participate in meeting with PSZJ and state court counsel for insurance purposes re mediation strategy and potential next counter (1.3);	1.40	\$875.00
5/21/2023	Timothy Burns	Correspondence with J. Bair re outcome of state court counsel meeting re mediation strategy (.1);	0.10	\$97.50
5/22/2023	Jesse Bair	Draft Section 3420 notice letter to the carriers (1.0); correspondence with T. Burns re same (.1);	1.10	\$687.50
5/22/2023	Jesse Bair	Draft letter to the Court re the Committee's participation at the upcoming Arrowood discovery hearing (.2);	0.20	\$125.00
5/22/2023	Jesse Bair	Participate in conference with T. Burns re the mediators' recent correspondence and potential response to same (.2);	0.20	\$125.00
5/22/2023	Karen Dempksi	Finalize and file with the Court letter re the Committee's participation at the upcoming Arrowood discovery hearing (.1);	0.10	\$36.00
5/22/2023	Jesse Bair	Analyze W. Chapin deposition transcript in preparation for Arrowood discovery hearing (2.1);	2.10	\$1,312.50
5/22/2023	Jesse Bair	Review correspondence from the mediators re potential next-steps (.1); review correspondence with J. Stang and state court counsel re same (.1);	0.20	\$125.00

5/22/2023	Timothy Burns	Review and consider correspondence from the mediators re potential next-steps(.2); participate in call with J. Bair re same (.2); prepare for state court counsel meeting re same (.4); participate in meeting with state court counsel and PSZJ for insurance purposes re mediation strategy and potential response to the mediators' recent correspondence (.7);	1.50	\$1,462.50
5/22/2023	Jesse Bair	Prepare for meeting with state court counsel and PSZJ re mediation strategy (.1); participate in meeting with state court counsel and PSZJ for insurance purposes re mediation strategy and potential response to the mediators' recent correspondence (.7);	0.80	\$500.00
5/23/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy and response to the mediators (1.1);	1.10	\$687.50
5/23/2023	Jesse Bair	Review initial draft of Committee letter to the mediators (.1); review suggested edits to same from state court counsel (.1);	0.20	\$125.00
5/23/2023	Jesse Bair	Preliminary review of email memorandum from L. Au re cause of action against Arrowood re Arrowood's unfair and deceptive claims practices (.1);	0.10	\$62.50
5/23/2023	Jesse Bair	Participate in call with T. Burns re draft Section 3420 notice letter, the Committee's draft response letter to the mediators, and upcoming Committee call re mediation strategy (.2);	0.20	\$125.00
5/23/2023	Jesse Bair	Participate in conference with B. Cawley re additional research needed in connection with finalizing Section 3420 notice letters to the insurers (.2); answer follow-up questions from B. Cawley in connection with same (.1);	0.30	\$187.50
5/23/2023	Brian Cawley	Participate in conferences with J. Bair re Section 3420 notice letters project (.3); draft revised version of Section 3420 notice letters to each of the Diocese's carriers (3.2);	3.50	\$1,470.00
5/23/2023	Jesse Bair	Review, edit, and draft additional portions of proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (5.1);	5.10	\$3,187.50
5/23/2023	Jesse Bair	Correspondence with I. Nasatir and J. Stang re draft Section 3420 notice letter to the insurers (.1);	0.10	\$62.50

5/23/2023	Timothy Burns	Participate in call with J. Bair re Committee response letter to the mediators and upcoming Committee call re mediation strategy (.2); participate in Committee meeting for insurance purposes re mediation strategy and response to the mediators (1.1); review correspondence from I. Nasatir re Section 3420 notice letter (.1); review correspondence from J. Stang re same (.1); review draft Committee response letter to mediators (.2); review and respond to correspondence with state court counsel re same (.2); review draft Section 3420 letter (.1); review correspondence from the mediator re mediation developments (.1);	2.10	\$2,047.50
5/23/2023	Jesse Bair	Review additional correspondence from the mediators re potential next-steps (.1);	0.10	\$62.50
5/24/2023	Jesse Bair	Review I. Nasatir correspondence re recent Diocese insurance activities (.1);	0.10	\$62.50
5/24/2023	Jesse Bair	Review and consider Order cancelling Arrowood discovery hearing and related orders designating Judge Cave as magistrate for all pre-trial purposes (.1); correspondence with PSZJ re same (.1);	0.20	\$125.00
5/24/2023	Timothy Burns	Review correspondence from PSZJ re mediation developments (.1); review correspondence from the mediators re same (.1); review final version of the Committee's response letter to mediators (.1);	0.30	\$292.50
5/24/2023	Jesse Bair	Review final version of Committee letter to the mediators and mediators' response to same (.1); review additional correspondence with J. Stang and state court counsel re same (.1);	0.20	\$125.00
5/25/2023	Jesse Bair	Review suggested edits received from J. Stang and I. Nasatir to draft Section 3420 notice letters (.1); review updated version of notice letters received from B. Cawley (.1); begin drafting revised version of insurer Section 3420 notice letters incorporating suggested edits (.3);	0.50	\$312.50
5/25/2023	Jesse Bair	Participate in portion of meeting with PSZJ team for insurance purposes re mediation and insurance strategy (.6);	0.60	\$375.00
5/25/2023	Timothy Burns	Participate in portion of meeting with PSZJ team for insurance purposes re mediation and insurance strategy (.5);	0.50	\$487.50
5/25/2023	Jesse Bair	Review Judge Cave's orders re discovery status update letters in the LMI and Evanston actions (.1);	0.10	\$62.50
5/26/2023	Jesse Bair	Participate in conference with T. Burns re insurance case strategy (.2);	0.20	\$125.00



5/26/2023	Timothy Burns	Participate in conference with J. Bair re insurance case strategy (.2); correspondence with state court counsel re Arrowood issues (.1); review correspondence with PSZJ re upcoming state court counsel meeting (.1); reviewed Order re Ninth Objection to Claims (.6); review motion to compel order (.1); review correspondence with PSZJ and the Committee re recent communications with the mediators and next-steps (.2); review correspondence from J. Bair re discovery developments in the insurance district court actions (.1); review correspondence from I. Nasatir re case insurance issues (.1); review PSZJ's next-steps memo (.2); review discovery order from Judge Cave (.1); review orders re assignment of magistrate for all pre-trial purposes in certain insurance district court actions (.2); participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.9); review and revise proposed unfair and deceptive claims practices complaint against Arrowood (.8); review the mediators' report to the court (.1);	3.80	\$3,705.00
5/26/2023	Jesse Bair	Continue revising and finalizing Section 3420 notice letters and transmit same to the carriers (1.5);	1.50	\$937.50
5/26/2023	Jesse Bair	Review the mediators' status report (.1);	0.10	\$62.50
5/26/2023	Jesse Bair	Review T. Burns' suggested edits to the proposed Arrowood unfair and deceptive claims practices complaint (.2); correspondence with PSZJ re same and related demand letter (.2);	0.40	\$250.00
5/26/2023	Jesse Bair	Review the Court's order sustaining in part the Diocese's ninth omnibus claims objection (.3);	0.30	\$187.50
5/26/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.8);	0.80	\$500.00
5/27/2023	Jesse Bair	Provide instructions to L. Au re drafting demand letter re proposed unfair and deceptive claims practices complaint against Arrowood (.2);	0.20	\$125.00
5/27/2023	Jesse Bair	Review correspondence with J. Stang and T. Burns re potential edits to draft unfair and deceptive claims practices complaint against Arrowood (.1);	0.10	\$62.50
5/27/2023	Jesse Bair	Correspondence with G. Greenwood and J. Stang re draft demand letter re proposed Arrowood unfair and deceptive claims practices complaint (.1);	0.10	\$62.50

5/29/2023	Jesse Bair	Preliminary review re J. Stang's suggested edits to the proposed Arrowood unfair and deceptive claims practices complaint (.1);	0.10	\$62.50
5/29/2023	Jesse Bair	Review the Diocese's 12th omnibus claims objection regarding late-filed claims (.1);	0.10	\$62.50
5/29/2023	Jesse Bair	Review the Diocese's eleventh omnibus claims objection regarding BSA claims (.2);	0.20	\$125.00
5/29/2023	Jesse Bair	Analyze and respond to insurance question from B. Michael re insurance impact, if any, of prosecution of certain state court lawsuits disallowed under the Court's recent order re pre-1957 abuse (.3);	0.30	\$187.50
5/30/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re mediation and litigation strategy (.6);	0.60	\$375.00
5/30/2023	Jesse Bair	Review and edit First Amended Trust Allocation Protocol (.2);	0.20	\$125.00
5/30/2023	Jesse Bair	Review and respond to correspondence with the Diocese re potential amendment to the Committee Intervention Order re discovery access in the Arrowood district court action (.1); prepare draft correspondence to Arrowood re same and requesting discovery meet and confer (.4);	0.50	\$312.50
5/30/2023	Jesse Bair	Review and edit First Amended Trust Agreement (.2);	0.20	\$125.00
5/30/2023	Jesse Bair	Review and edit draft Committee memorandum re motion to dismiss issues, including drafting of insurance section of same (1.3); review correspondence with I. Nasatir re same (.1); participate in conference with T. Burns re same (.1);	1.50	\$937.50
5/30/2023	Jesse Bair	Participate in call with T. Burns re outcome of Purdue Pharma decision (.1);	0.10	\$62.50
5/30/2023	Timothy Burns	Participate in call with state court counsel re insurance strategy issues (.1); review Purdue Pharma decision (.8); conference with J. Bair re same (.1); preliminary analysis re potential Committee Second Amended Plan edits (.1); participate in conference with J. Bair re motion to dismiss memo (.1); correspondence with B. Michael re team strategy meeting (.1); participate in portion of Committee meeting for insurance purposes re mediation and litigation strategy (.6);	1.90	\$1,852.50
5/30/2023	Jesse Bair	Review and edit for insurance purposes the Second Amended Committee Plan (1.9); participate in conference with T. Burns re same (.1);	2.00	\$1,250.00

5/30/2023	Jesse Bair	Review correspondence with I. Nasatir and K. Dine re insurance impact, if any, of prosecution of certain state court lawsuits disallowed under the Court's recent order re pre-1957 abuse (.1);	0.10	\$62.50
5/30/2023	Leakhena Au	Draft demand letter re proposed unfair and deceptive claims practices complaint against Arrowood (2.3);	2.30	\$966.00
5/31/2023	Timothy Burns	Participate in conference with J. Bair re motion to dismiss memo (.1); review and revise motion to dismiss memo for insurance purposes (.8); participate in strategy call with PSZJ for insurance purposes re litigation, mediation, and Plan strategy (1.2); review correspondence with J. Stang, the Diocese, and Judge Cave re mediation (.2); review agenda for state court counsel meeting (.1); correspondence with state court counsel re Arrowood solvency issues (.1); review Evanston correspondence re joint discovery letter (.1); reviewed T. Law's letter to court re discovery and Lexington's suggested changes (.2); conference with J. Bair re proposed Arrowood complaint edits (.3); review J. Bair correspondence to Arrowood re adversary proceeding participation (.1); participate in portion of state court counsel meeting for insurance purposes re litigation, mediation, and Plan strategy (1.1);	4.30	\$4,192.50
5/31/2023	Jesse Bair	Edit and finalize discovery meet and confer correspondence to Arrowood (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Correspondence with B. Michael re agenda for upcoming team strategy call (.1); prepare for team strategy call with PSZJ (.1); participate in strategy call with PSZJ for insurance purposes re litigation, mediation, and Plan strategy (1.2); participate in follow-up conference with T. Burns re potential changes to proposed Arrowood unfair claims practices complaint in light of meeting (.3);	1.70	\$1,062.50
5/31/2023	Jesse Bair	Review correspondence with the Diocese and Judge Cave re continued mediation negotiations (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Participate in portion of state court counsel meeting for insurance purposes re litigation, mediation, and Plan strategy (1.1);	1.10	\$687.50
5/31/2023	Jesse Bair	Review draft joint status letter to the Court in the LMI/Lexington district court action (.1); review Lexington's suggested edits to same (.1);	0.20	\$125.00

5/31/2023	Jesse Bair	Participate in conference with T. Burns re motion to dismiss memo (.1); review T. Burns' suggested insurance edits to same (.1); finalize insurance-related sections of memo (.1);	0.30	\$187.50
5/31/2023	Jesse Bair	Review draft joint status letter to the court in the Evanston district court action (.1); review correspondence with the Diocese and Evanston re potential edits to same (.1);	0.20	\$125.00
<b>Total Hours and Fees</b>			<b>247.80</b>	<b>\$151,579.75</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/9/2023	Taxi, J. Bair (airport to hotel)	\$83.29
5/9/2023	Hotel, T. Burns (1 night)	\$644.21
5/9/2023	Travel meal, T. Burns	\$10.82
5/9/2023	United Airlines, T. Burns (May 9-10 ORD-LGA)	\$374.70
5/9/2023	Hotel, J. Bair (1 night)	\$485.46
5/9/2023	Travel meal, J. Bair	\$16.33
5/9/2023	Delta Airlines, J. Bair (MSN-LGA May 9-10)	\$269.70
5/9/2023	Delta Airlines WiFi, J. Bair	\$9.95
5/10/2023	Delta Airlines WiFi, J. Bair	\$15.95
5/10/2023	Travel meal, T. Burns	\$36.30
5/10/2023	Travel meal, J. Bair	\$20.73
5/10/2023	Airport parking, J. Bair	\$20.00
5/16/2023	Westlaw, legal charges to obtain exhibits from Delaware Court in Arrowood mandamus action	\$697.00
5/18/2023	Taxi, J. Bair (airport to hotel)	\$99.96
5/18/2023	Taxi, T. Burns (airport to hotel)	\$127.00
5/18/2023	United Airlines, T. Burns (MSN-EWR May 18-19)	\$927.80
5/18/2023	Delta Airlines, J. Bair (May 18-19 MSN-LGA)	\$1,037.10
5/18/2023	Delta WiFi Onboard, J. Bair	\$4.95
5/18/2023	United Inflight Wi-Fi, T. Burns	\$8.00
5/18/2023	Hotel, T. Burns (1 night)	\$670.31
5/18/2023	Hotel, J. Bair (1 night)	\$670.31
5/19/2023	Airport parking, J. Bair	\$20.00
5/19/2023	Hotel, T. Burns (1 additional night)	\$670.31
5/19/2023	Uber, J. Bair (mediation to airport)	\$125.96
5/20/2023	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
5/20/2023	Travel meal, T. Burns	\$30.59
<b>Total Expenses</b>		<b>\$7,084.73</b>

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Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.90	\$360.00	\$324.00
Brenda Horn-Edwards	0.80	\$360.00	\$288.00
Brian Cawley	17.20	\$420.00	\$7,224.00
Jesse Bair	19.50	\$312.50	\$6,093.75
Jesse Bair	79.60	\$625.00	\$49,750.00
Karen Dempski	0.10	\$360.00	\$36.00
Leakhena Au	29.40	\$420.00	\$12,348.00
Nathan Kuenzi	17.30	\$420.00	\$7,266.00
Timothy Burns	26.00	\$487.50	\$12,675.00
Timothy Burns	57.00	\$975.00	\$55,575.00

**Total Due This Invoice: \$158,664.48**

## **EXHIBIT G**

### **Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 20-12345 (MG)
	)	
THE ROMAN CATHOLIC DIOCESE OF	)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,	)	
	)	
Debtor. <sup>1</sup>	)	

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**ORDER GRANTING  
EIGHTH INTERIM APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY  
BURNS BAIR LLP AS SPECIAL INSURANCE COUNSEL  
FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH MAY 31, 2023**

Burns Bair LLP (“Burns Bair”) as Special Insurance Counsel to the Official Committee of Unsecured Creditors in the above-captioned case, filed its Eighth Interim Application for Compensation for the Period from February 1, 2023 through May 31, 2023 (the “Fee Application”). The Court has reviewed the Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Fee Application, and any hearing on the Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Fee Application. Accordingly, it is hereby

**ORDERED** that the Eighth Fee Application is GRANTED. The Debtor in the above case shall pay to Burns Bair interim fees in the total amount of \$354,008.68 for services rendered and actual and necessary expenses in the Chapter 11 case during the Interim Compensation Period, after deducting interim payments already received by Burns Bair pursuant

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

to the Interim Compensation Orders for necessary professional services rendered by Burns Bair,  
for the period February 1, 2023 through May 31, 2023.

**ORDERED** that this Court retains jurisdiction with respect to all matters arising  
from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_, 2023.  
New York, New York

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THE HONORABLE MARTIN GLENN  
U.S. BANKRUPTCY JUDGE